



**GREATPINE
INVESTMENTS**

**Great Pine Investments LLC, A Division of Snowball
Capital LLC**

801 Brickell Avenue, 8th Floor

Miami, FL 33131

Member FINRA, SIPC

PRIVACY PLEDGE 2024

At Snowball Capital, we pledge and are committed to maintain the privacy of your personal information we obtain about you, and use it in a fair and lawful manner. This Pledge explains our privacy commitment. It describes: the non-public personal information we collect about you; why we collect it; when we may share it with others; and where you can receive more information about this policy.

To whom and what does the Pledge apply?

All current and former Snowball Capital customers are covered by this pledge. In addition, this Pledge covers the personal information of other individuals with whom Snowball Capital has an existing or prospective relationship where either (a) such protection is required by applicable laws, rules or regulations; or (b) Snowball Capital has made a separate and specific commitment to that effect. In this Pledge “personal information” refers to any information relating to an identified individual, or any “nonpublic personal information.”

What personal information do we collect and how do we collect it?

By law and by corporate policy of Snowball Capital and our affiliates, it is important that we collect and maintain accurate information about you. We may obtain this information from various forms you submit to us, from your business dealings with us, from customer reporting agencies, and other third party sources. The personal data gathered generally varies depending on the products or services you request and may include your basic contact information such as name, address, phone number, and e-mail address. In addition, your tax identification number, income, assets and source of wealth. This is not an all-inclusive list, the data may be collected depending on appropriate business needs. In addition, we may photocopy documents that verify your identity such as your driver’s license or passport.

How do we use personal information?

We use your personal information to help us deliver the best possible service to you. This may include, depending on the nature of your relationship with us, using it to evaluate investment suitability, respond to inquiries and requests; fulfill our obligations to you; verify income, asset and obligation information; resolve disputes, prevent fraud; and perform risk control and due diligence. Additionally, we may use your personal information to verify your identity, including where applicable, verification in accordance with the USA PATRIOT Act.

Where permitted and appropriate, we may also use personal information for Snowball Capital’s marketing and product research and/or development purposes. Additionally, we use personal information to comply with legal and regulatory requirements, and in accordance with applicable laws, rules and regulations.

What personal information do we share externally with nonaffiliated third parties and why do we share it?

It is important to note:

Snowball Capital does not rent or sell any client or former customers’ personal information to any third party.

We may transfer some of all of your personal information to nonaffiliated third parties that provide technology we use to deliver you better service. Confidentiality and protection of client information is a part of the agreements we sign with each provider. The provider cannot use individual Snowball Capital client information for their own purposes.

We may also transfer some or all of your personal information to nonaffiliated third parties to provide you the products and services you request of us. These nonaffiliated third parties may be financial service providers (such as broker-dealers, banks or insurance companies) or others (such as professional services organizations or other service providers).

Finally, we may also transfer personal information (a) to government agencies, exchanges and other self-regulatory organizations and regulatory and law enforcement authorities as necessary or required; (b) to other nonaffiliated third parties such as your accountant or lawyer as requested by you or your authorized representative or as permitted or required by law, rule and/or regulation. If you decide to terminate our services or become an inactive customer, we will continue to adhere to our privacy policy regarding your information, as may be amended from time to time.

How do we protect the confidentiality and security of personal information?

We restrict access to your personal data to those who require it to develop, support, offer and deliver products and services to you. We maintain and monitor our physical, electronic and procedural safeguards to comply with all applicable laws and regulations.

How can you verify that your personal information is accurate?

We endeavor to keep personal information only for so long as is necessary for business purposes or to meet our legal and regulatory requirements; and keep our records of your personal information current and complete. If you become aware of any discrepancies in your personal information, please notify us and we will make the necessary corrections. During the normal course of business we may ask you if there are any updates to the information you previously provided to the Firm, and we are happy to review the information we have about you at any time.

What if you have questions regarding this Pledge or our privacy practices?

If you have any questions regarding this Pledge or our privacy-related practices, please contact Compliance by email at susan@dumontcc.com.