



## *Statement of Privacy Policy*

**Our Commitment to Your Privacy:** Protecting clients' privacy is of paramount importance to SkyOak Capital, Inc. (the "Firm" or "Advisor"). It is SkyOak's policy that no private client financial information obtained by the Firm is sold or made available to third parties, except that:

- Third parties may be used by the Firm to assist in the management or maintenance of client accounts (such as a custodian, broker or bank).
- Client information may be released to client's accountancy, legal and other third party representatives at client's direction.
- Client information may be released in accordance with applicable laws and regulations.

The Firm will not share non-public personal information about its clients with nonaffiliated third parties without prior client consent, except for specific purposes described below. This notice explains the Firm's collection, use and safeguarding of client information.

**How SkyOak Gathers Information:** In connection with providing clients with investment management services, the Firm may obtain information about its clients from the following sources:

- Client agreements and other information that clients provide to the Firm, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client's name, address, phone number, email address, social security number, employment information, income, investment experience, and credit references;
- Personal tax returns provided by the client;
- Trusts, wills and other estate planning documents provided by client;
- Transactions on a client's behalf. This information may include the client's account balances, positions, investment interests and history;
- Consumer reporting agencies. This information may include account information and credit history; and
- Public sources.

**Sharing Information with Nonaffiliated Third Parties:** Advisor only discloses non-public client information to nonaffiliated third parties when it is believed necessary for the Firm's provision of services to you or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;
- To perform services for the Firm or on its behalf to develop or maintain proprietary trading or other software
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of the Firm's business or an operating unit;
- To help prevent fraud;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the Firm;
- To comply with federal, state or local laws, rules and other applicable legal requirements; and

SkyOak does not make any disclosure of client non-public personal information to other companies who may want to sell their products or services to you. For example, the Firm does not sell client lists and the Firm will not sell client names to catalogue companies.