

# Website Privacy Policy

(Last updated March 1, 2017)

At CABANA, LLC (d/b/a “Cabana Asset Management”) (“Cabana”), maintaining our clients’ trust and confidence is of superior importance. We are committed to safeguarding your personal information and providing you with facts and options about how your information may be shared. Please read this notice to learn more about our privacy policies and the options available to you. The purpose of this privacy policy is to provide you with a description of the types of information we collect about you when you visit the <https://cabanaportfolio.com> website (the “Website”), and how we use that information. By visiting or using the Website, you agree to the provisions of this privacy policy. If you do not agree to the terms of this Policy, please do not use the Website. This policy only applies to information collected while you are receiving services from Cabana and/or on the Website.

This notice is being provided to you in accordance with the Securities and Exchange Commission’s rule regarding the privacy of consumer financial information (“Regulation S-P and S-AM”). Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all, sharing. Please take the time to read and understand this Privacy Notice which summarizes the non-public personal information we gather, how we share that information and how we safeguard (protect) that information.

## **CONFIDENTIALITY AND SECURITY**

The security of your account is important to us. We restrict access to nonpublic personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information. All employees are instructed to protect the confidentiality of your personal information as described in these policies, which are strictly enforced.

## **Information We Collect**

We collect and store personal information that you voluntarily provide to us in order for us to provide financial services and products to you as well as data related to your Website visit and usage. Personally identifiable and financial information is any information about you that is personally identifiable, such as your name, address, email address or phone number, that we receive from you on applications or other forms, information about your transactions with us, our affiliates, or others, information we receive from a consumer reporting agency, and any other information that is not otherwise publicly available. Information that you provide on applications, questionnaires, subscription documents, or other forms including name, address, social security number, assets, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial plan interests, wills, trusts, mortgages, tax returns, and income. Information about your transactions with us, our affiliates, or others (e.g. custodians, clearing firms, or other chosen investment providers, record keepers, and insurance providers) such as balances, payment history, parties to transactions, account usage.

In addition, during your visit, we automatically collect certain aggregate information related to your Website visit. Aggregate information is non-personally identifiable or anonymous information about you, including the date and time of your visit, your IP address, your computer browser information, the Internet address that you visited prior to and after reaching the Website, the name of the domain and host you used to access the Internet, and the features of our Website which you accessed.

### **Use of Cookies**

Cookies are simple text files stored on your computer for use by a browser. Certain Website features may only be available through the placement of a cookie. We may use cookies to assist in data collection and to track visitor Website usage and trends to help us better serve you. The use of cookies is a standard practice among Internet Websites; most Internet browsers permit a user to accept, decline or delete cookies. This Website works with a first party cookie that collects anonymous traffic data at the Website.

### **How We Use Information**

We use collected information to make available and to improve our high standard of reliable financial services. We use such information to: respond to inquiries or service requests and monitor such responses; provide information about and market our products or services resolve problems, and manage the Website and assess its usage.

### **Disclosure of Information**

We restrict the disclosure of your personal non-public and confidential information. We only disclose your information as indicated or as required by law. In accordance with Section 248.13 of Regulation S-P (and S-AM), we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all non-affiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information. We may share client information with third party sub-advisers who specialize in strategies outside the scope of our traditional product suite. Clients are not required to use the services of the third party sub-advisers and may limit the information we provide.

Federal law gives you the right to limit our sharing information with an affiliate for their everyday business purposes except when we have a sub-advisory relationship with that affiliate. State laws may give you additional rights to limit sharing. Please contact us in writing to limit the sharing of your personal information at 220 S. School Ave., Fayetteville, AR 72701 or you may email our Chief Compliance Officer Nik Paunov at [nik@cabanaportfolio.com](mailto:nik@cabanaportfolio.com).

### **Links and Redirection to Third Party Sites**

The Website contains links to third-party Websites and may redirect you to third-party Websites ("Third Party Sites"). Third Party Sites are not under the control of Cabana, and Cabana is not responsible for such Third Party Sites, including without limitation the accuracy, sufficiency, correctness, reliability, veracity, completeness, or timeliness thereof, any link contained therein, or any changes or updates thereto. The inclusion or access to Third Party Sites does not imply an endorsement thereof by Cabana, or of the provider of such content or services, or of any third party Website. Cabana reserves the right to terminate any link or linking program at any time.

Please be aware that when you enter a third party Website, any information you provide, including financial information, is subject to the terms of use and privacy policy of that site.

### **SHARING INFORMATION WITH THIRD PARTIES NOT AFFILIATED WITH CABANA, LLC**

We disclose information to unaffiliated third parties as required or permitted by law. Please be assured that whatever the reason for sharing your personal information, we take steps to assure that those parties respect your privacy by limiting the use of the information to the purpose for which it was disclosed. These unaffiliated third parties may include:

- Companies that perform services to your account that we do not provide ourselves. Such services may include account valuation, preparation of account statements, determination of fees, and printing services.
- Companies that will help protect your account from fraud.
- Companies that provide services necessary to effect a transaction you request or to service your account.
- Government agencies, courts, parties to lawsuits, or regulators in response to subpoenas. In such cases, we share only the information that we are required or authorized to share.

### **ACCURACY**

Cabana strives to maintain accurate personal information in our Client files at all times. However, as personal situations, facts and data change over time, we encourage our Clients to provide feedback and updated information to help us meet our goals.

### **FORMER CLIENTS**

If you end your relationship with Cabana LLC, we will continue to adhere to the policies and procedures described in this notice.

### **Effective Date; Policy Changes**

Each time you use the Website, the current version of the policy will apply. Accordingly, when you use the Website, you should check the date of this policy (which appears at the top of the policy) and review any changes since the last version. We reserve the right to add to, change, update or modify this Privacy Policy at any time and without notice other than simply posting such changes, update or modification on this Website. Any such change, modification or update will be effective immediately upon posting on the Website.

### **Limitation of Liability**

UNDER NO CIRCUMSTANCES SHALL CABANA BE LIABLE FOR ANY DAMAGES (INCLUDING, BUT NOT LIMITED TO DIRECT, INDIRECT, PUNITIVE, SPECIAL, INCIDENTAL, CONSEQUENTIAL, LOST PROFITS OR LOST REVENUE) THAT RESULT FROM THE USE OF THE INFORMATION OR MATERIALS ON THIS WEBSITE, EVEN IF CABANA HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.

### **Governing Law**

This policy is governed by the laws of the State of Arkansas without giving effect to any principles of conflict of law.

**Contact Us**

To contact us with your questions or comments regarding this policy or the information collection and dissemination practices of this Website, please email us at:

[daniel@cabanaportfolio.com](mailto:daniel@cabanaportfolio.com) or call us at (479) 442-6464.

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