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PRIVACY POLICY

Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or other Information. If you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

Bellaire Capital Management, LLC maintains a strict opt-in policy for data sharing. We do not share your nonpublic personal information with any third party for marketing purposes. We share your information only in the following limited circumstances, each of which is necessary to service your account or is required by law:

- Necessary service providers – We share information with custodians and other firms that are essential to the administration of your account, such as Charles Schwab & Co., Inc., solely to the extent necessary to execute transactions, maintain your account(s), and deliver advisory services to you.
- Legal and regulatory requirements – We may disclose information as required by law, court order, subpoena, or regulatory examination, including to the SEC, FINRA, or other applicable regulatory or law enforcement authorities.

We do not share your information with affiliates or non-affiliates for marketing purposes, and we do not engage in joint marketing arrangements with other financial companies. Your information will never be shared for any purpose beyond those listed above without your prior affirmative written consent.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

INCIDENT RESPONSE PROGRAM

In accordance with the SEC's May 2024 amendments to Regulation S-P, Bellaire Capital Management, LLC has established a written Incident Response Program designed to detect, respond to, and recover from unauthorized access to or use of customer information. Key elements of this program include:

- **Detection & Response:** We maintain written policies and procedures to promptly detect and respond to any unauthorized access to or use of sensitive customer information.
- **Customer Notification:** In the event of a security incident, we will notify affected individuals within 30 days of determining whether sensitive customer information was, or is reasonably likely to have been, accessed or used without authorization. Notification will include details about the incident and guidance on steps you can take to protect yourself.
- **Service Provider Oversight:** We require service providers and vendors who handle customer information on our behalf to implement appropriate safeguards and to notify us within 72 hours of any security breach affecting our customers' information.
- **Recordkeeping:** We maintain written records documenting our compliance with these requirements for a minimum of five years.

ANNUAL PRIVACY NOTICE EXCEPTION

Consistent with the Fixing America's Surface Transportation Act (FAST Act) and the 2024 Regulation S-P amendments, because Bellaire Capital Management, LLC only shares nonpublic personal information in circumstances that qualify under the exceptions to the opt-out requirement (i.e., necessary service providers and legal/regulatory disclosures), and does not engage in marketing-related sharing, we qualify for the annual privacy notice delivery exception provided we have not changed our information-sharing policies and practices since our last notice to you. We will deliver an updated notice whenever our practices change.

OUR OPT-IN DATA SHARING POLICY

Unlike many financial firms, Bellaire Capital Management, LLC operates on an opt-in basis for any data sharing beyond what is strictly necessary to service your account. This means:

- We will never share your nonpublic personal information for marketing purposes – whether with our own affiliates, joint marketing partners, or unaffiliated third parties – without your prior affirmative written consent.
- You do not need to take any action to protect your information from marketing-related sharing. Your privacy is protected by default.
- If you wish to authorize us to share your information for any purpose not described in the "Parties to Whom We Disclose Information" section above, you may contact us at the address or telephone number below to provide written consent.
- You may withdraw any consent you have given at any time by contacting us in writing.

Federal and state law may provide you with additional rights to limit certain types of information sharing. Please contact us if you have any questions about your rights or our data sharing practices.

DEFINITIONS

Affiliates – companies related by common ownership or control. They can be financial and non-financial companies.

Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies.

Sensitive Customer Information – any component of customer information alone or in conjunction with other information whose compromise could create a reasonably likely risk of substantial harm or inconvenience to an individual, including Social Security numbers, driver's license numbers, financial account numbers, and authentication credentials.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

Regulatory Compliance Note: This policy has been reviewed against SEC Regulation S-P (as amended May 2024, 89 FR 47688) and FINRA guidance. Content shown in green reflects additions required to comply with the 2024 Reg S-P amendments. Larger RIAs (AUM ≥ \$1.5B) must comply by December 3, 2025; smaller RIAs must comply by June 3, 2026.