

2021 Privacy Policy Disclosure

Policy Regarding the Safeguard of Client Information

SunSage Capital has always considered the privacy, confidentiality and security, of personal information received about prospective clients, clients ("Client"), former clients, and employees, obtained directly from you or from others in the performance of our business, to be of paramount importance. SunSage has been entrusted with your personal information, and SunSage acknowledges that trust as a vital cornerstone in our relationship with you.

Personal Information We Collect About You

The personal information SunSage collects may include, among other things, your Name, Gender, Social Security Number (SSN) or Taxpayer Identification Number (TIN), Date of Birth, Mailing Address, E-mail Address, Phone Number, Annual Income, Net Worth, Liquid Assets, Account Balances, Account Holdings, Investment Activity, and Account Information from other firms.

How We Use Your Personal Information

SunSage uses your personal information to determine the appropriateness of investments for your portfolio, setup your brokerage account with a custodian, interact with the custodian on your behalf when managing your investments, and to conduct other business related to the management of your accounts.

How We Disclosure of Your Personal Information

SunSage does not sell your personal information to anyone. SunSage does not share your personal information with nonaffiliated third parties except under the following conditions: (A) You have instructed us to share your information (B) You have requested a service that requires us to share your information (C) You have a chosen advisor, who may have referred you to us, that requests us to share your information (D) if we are compelled to do so by law or to prevent fraud, or (E) if we need to report suspected client abuse, neglect, or extortion.

How We Safeguard Your Personal Information

SunSage restrict access to information about you to those employees who need to know the information in order to perform their jobs, such as servicing your accounts, providing you with information you request, or notifying you of new products and services. To protect your personal information, we maintain physical, electronic, and procedural safeguards in keeping with industry standards and practices, and we review and adjust these safeguards regularly in response to advances in technology.

How We Handle Your Online Privacy

SunSage does not use cookies, web beacons, or other methods to secretly collect information. We do use our e-mail system and web site to deliver (and request) information directly to (and from) you. Industry standard e-mail security is utilized. SunSage web site information is secured & encrypted using SSL certificate technology.

How We Keep You Informed

We may revise this Privacy Policy from time to time. If we intend to use or disclose personal information for purposes materially different than those described in this policy, we will make reasonable efforts to notify you including by posting the revised Privacy Policy on our web site: <http://www.sunsage.com>

Your Help is Needed

For your protection, you should not provide your account information to anyone. If you become aware of any suspicious activity relating to your account, it is your responsibility to contact us immediately. If you have any questions relating to this privacy policy or concerns about the way in which we have handled information about you, please do not hesitate to send us an e-mail at kohl@sunsage.com or call us at (214) 989-7710.

2021 Approved Broker-Dealer Disclosure

Approved List of Broker-Dealers

Client accounts managed by SunSage must reside at an approved custodial broker-dealer. Having all client accounts at the same broker-dealer reduces operational cost and streamlines portfolio trading. The broker dealer holds the client's assets and transacts business as directed by the client and SunSage, the investment manager.

The following broker-dealers are approved for client accounts managed by SunSage:

Fidelity Brokerage Services LLC, Member NYSE, SIPC, 900 Salem Street, Smithfield, RI 02917
<http://www.fidelity.com>
1 (800) 343-3548

2021 Best Execution Practices Disclosure

How we keep brokerage costs reasonable for the investor

SunSage considers the full range & quality of service a broker offers when selecting a firm for its clients. Among other things, we study the broker's execution capability, commission rates, custodial fees, financial stability, and responsiveness. We are currently using Fidelity Investments as our approved custodial broker-dealer for client accounts.

- A. The brokerage firm selected offers accounts with a fixed \$220 annual fee paid on a quarterly basis (\$55 per quarter).
- B. The brokerage firm selected offers commission free or relatively low commission trades as compared to other firms across the industry.
- C. Lowest commission cost (commission free in most cases) is obtained from the selected brokerage firm when the client agrees to receive account & trade documentation electronically.
- D. In most cases, client accounts are traded on an individual basis rather than utilizing block trades. In the past, block trades might have lowered the impact of commission costs. With commission free trades, block trades don't necessarily add value and might risk biased trade allocation.
- E. SunSage's longer term investment strategies mean most portfolios will experience low turnover. Low turnover combined with low commissions should result in a low cumulative commission impact on client accounts.

SunSage monitors and evaluates competing brokerage firms on an annual basis to ensure the broker selected provides the client with the best mix of execution, service and value.

2021 Restricted Securities Disclosure

List of Restricted Securities

A list of restricted securities is commonly established by firms to prevent internal conflicts of interest. The following securities cannot be purchased by an employee of SunSage capital without written permission by SunSage's Chief Compliance Officer.

Restricted Securities:

None

2021 Access Person Disclosure

Annual Identification of SunSage Capital's Access Persons

Advisers Act Rule 204A-1 and SunSage Capital's Code of Ethics requires that all Access Persons are identified both present and past. An Access Person is someone who has access to nonpublic information regarding clients' purchase or sale of securities, is involved in making securities recommendations to clients or who has access to such recommendations that are nonpublic. The following individuals are currently considered Access Persons of SunSage:

Clayton Kohl

SunSage Capital's Managing Member & Chief Compliance Officer
Registration: SEC Registered Investment Advisor
Service: 2001 to Present

Barbara Kohl

Marketing & Media Relations
Service: 2006 to Present

In addition to the above list, the following individuals have been considered Access Persons over the last five years:

None

2021 Organization Disclosure

Annual Organization Chart

Managing Member & Chief Compliance Officer
Clayton Kohl
|
Marketing & Media Relations
Barbara Kohl