

# 2020 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.

### 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](mailto:kohl@sunsage.com) or call us at (214) 989-7710.

# 2020 Approved Broker-Dealer Disclosure

## Approved List of Broker-Dealers

Client Accounts managed by SunSage must reside at an approved broker-dealer. The broker dealer holds the client's assets and transacts business as directed by the client and/or SunSage, the investment manager.

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

Fidelity Investments / 1 (800) 544-6666 / P.O. Box 770001, Cincinnati, OH 45277-0002

# 2020 Best Execution Practices Disclosure

## How we keep brokerage costs reasonable for the investor

SunSage considers the full range and quality of a broker's services in recommending to clients a firm including, among other things, execution capability, commission rates, financial stability, and responsiveness.

- A. The brokerage firm we recommend offers accounts with no annual fee.
- B. The brokerage firm we recommend offers relatively low commission costs as compared across the industry.
- C. Lowest commission cost is obtained from the recommended 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 which may result in a somewhat higher commission cost impact to the client's account but ensures unbiased trade allocation.
- E. Because of the long term nature of SunSage's investment strategy, low turnover and as a result, low cumulative commission cost impact should be expected.

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

# 2020 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

# 2020 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 Capital:

**Clayton G Kohl**

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

**Barbara L Kohl**

Spouse of SunSage Capital's Managing Member & Chief Compliance Officer  
Service: 2006 to Present

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

None

# 2020 Organization Disclosure

## Annual Organization Chart

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