

Introduction

Alta Capital Management, LLC (“Alta”, “we,” “us,” or “Company”) is strongly committed to respecting and protecting your privacy. Please carefully read the following privacy policy (“Policy”). In order to ensure your privacy, the information we collect from clients and visitors to this Website (the “Site”) is used only in the manner and for the purposes described in this Policy.

The purpose of this Policy is to explain the type of information that the Company collects, what we do with that information, and with whom the Company shares this information. Anyone who provides personally identifiable information (“Personal Information”) or any other information to the Company consents to the collection, use and disclosure of such information under the terms of this Policy. This Policy applies to both our clients to whom we provide services (“Clients”) and to those individuals who browse and use our Site (“Visitors”).

Information Collected From Visitors to our Site

We use cookies and similar technologies to recognize you and/or your device(s). Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. When you access altacapital.com (or any web site), your web browser may automatically send information about your computer, e.g., your User agent and IP address, if the software used enables cookies. We do not store this information; however, we do use it to measure and track visitors to our Site. This enables us to improve our Site, for example, by determining whether Visitors can find information easily, or by identifying the aspects of the Site that are of the most interest to them. However, we do not run third-party browser cookies on our Site. You can change your cookie preferences by changing the setting on your web browser to delete or reject cookies. If you delete or reject cookies, some website pages may not function properly.

Voluntary information collected through the “Contact Us” page is securely maintained by us and is used only for the purposes outlined herein. Once you have requested information from us, we may communicate with you via email regarding your request to provide additional information related to your initial information request. However, we will never ask you to send non-public personal information such as account or Social Security numbers by non-secure email. By continuing to visit or use our Site, you are agreeing to the use of cookies and similar technologies for the purposes we describe in this Policy.

Websites That We Link To

Internet sites that you link to from the Alta Site may contain privacy provisions that differ from the provisions of our Privacy Policy. To ensure your privacy is protected, we recommend that you review the privacy statements of other Internet sites linked to our Site.

Our Privacy Notice

Alta maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ non-public personal information (“information”). Through this Policy and its underlying procedures, Alta attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of Alta to restrict access to all current and former clients' information to those employees and affiliated/non-affiliated entities who need to know that information in order to provide our products or services.

In that regard, Alta may disclose the client's information:

- (1) to individuals and/or entities not affiliated with Alta, including, but not limited to the client's other professional advisors and/or service providers that may be engaged by Alta;
- (2) if we are required to do so by judicial or regulatory process; or,
- (3) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

We can share your personal information with any person or entity if we have your consent to do so.

The disclosure of information contained in any document completed by a client for processing and/or transmittal by Alta to a third-party service provider to facilitate a business relationship between the client and Alta shall be deemed as having been automatically authorized by the client with respect to the corresponding third-party service provider.

Sometimes we share your personal information with our affiliated entities or third-party service providers that are located outside of your home country. These countries may have different privacy laws and data protection compliance requirements. We will take appropriate steps to ensure your personal information is handled as described in this Privacy Policy. Where required, we comply with applicable country legal frameworks relating to the protection and transfer of personal information.

Alta permits only authorized employees who have signed a copy of Alta's Policies and Procedures Manual and Code of Ethics to have access to client information. Employees violating Alta's policies will be subject to Alta's disciplinary process. Additionally, whenever we hire other organizations to provide services to the clients, we require them to sign confidentiality agreements.

Depending on how and where you interact with us, you may have a right to one or more of the following with respect to your personal information we process or control

- request access to your personal information,
- request clarification of any inaccuracy,
- request erasure or restriction of processing of your personal information,
- object to processing by us or on our behalf, and
- withdraw your consent to processing.

To exercise one or more of these rights or to ask a question, please use the contact details below.

Amendment and Contact Information

From time-to-time, we may update, modify or change this Policy. When this occurs, our new Policy will be posted on this Site. We urge you to check this Site periodically to review the most recent Privacy Policy.

Should you have any questions about this Policy, please contact us at:
contactaltacapital@altacapital.com.

Amended and Effective: This Policy took effect January 21 2019.