

## **Zevenbergen Capital Investments LLC Privacy Notice**

Zevenbergen Capital Investments LLC (ZCI) is committed to maintaining the confidentiality, security and integrity of information provided to the firm by clients (to include current, prospective and former clients). ZCI collects information about its clients solely with the intent to provide investment advisory services and to meet legal and regulatory requirements.

### **Security of Nonpublic Personal Information**

The importance of treating all client information with strict confidentiality is communicated to every employee and ZCI's Privacy Policy has been made a part of the firm's Compliance Program. In addition, ZCI has developed a detailed internal policy outlining various procedures and processes to ensure the firm maintains physical, electronic and operational safeguards to protect client information.

### **Sources of Nonpublic Personal Information**

In the course of providing service to clients, nonpublic, personal client information may be collected from investment advisory agreements, custodial agreements and custodial statements including names, birthdates, addresses, telephone and fax numbers, email addresses, social security numbers, account numbers, assets and liabilities, investment positions, transactions, experience and objectives, distributions, transfers, check-writing activity, credit card activity, etc. ZCI may also obtain information from clients and their accountants, attorneys and consultants, such as tax returns, financial statements or relevant legal documents. The firm also collects nonpublic personal information during client meetings, written and email correspondence and phone conversations (we cannot guarantee correspondence will remain secure during transfer of such information, but will ensure its protection once received).

For those clients who access the secure section of ZCI's website, a small file of information ("cookie") is stored on the user's computer. This file is a technical requirement that establishes and maintains a secure session. ZCI does not disclose any information retrieved from Internet information files. (Please note that while online client information is secure, it may be accessed by anyone to whom you provide your unique user ID and password.)

### **Disclosure of Nonpublic Personal Information**

ZCI may disclose client information in the normal course of providing investment advisory services, as permitted by law and as required to maintain firm-wide operations for the benefit of clients under the following circumstances: 1) as required to legal or regulatory authorities, 2) as required under legal or regulatory obligation, 3) as requested by ZCI's insurer(s), 4) to a limited number of service providers (i.e. corporate counsel, technology providers and auditors) that may have access to client information but are held to the same high standards of confidentiality, 5) to broker-dealers, custodians and similar organizations to effect securities transactions and facilitate other services, 6) under certain circumstances to our partner(s); evenstar3 inc. and Virtus Partners, Inc. as necessitated through our business partnership and 7) at the direction of a client, the firm may provide information to the client's accountants, consultants, attorneys or other individuals/organizations. It is ZCI's policy not to disclose client information to unaffiliated third parties except as noted above.

### **Privacy Notice**

ZCI will mail its Privacy Notice annually on or around November 1st. A revised notice will be sent out immediately if any material changes occur. For your convenience, a copy of the Privacy Notice may be found on the client-access section of our corporate website at [www.zci.com](http://www.zci.com).