

# FACTS

## WHAT DOES OBSIDIAN CIO, LLC DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and financial information
- Investment holdings and investment experience
- Financial goals and financial history

When you are *no longer* our customer, we continue to share your information as described in this notice.

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Obsidian CIO, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Obsidian CIO, LLC share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

### Questions?

Call 917.403.2622 or email: [joe@obsidiancio.com](mailto:joe@obsidiancio.com)

## Who we are

Who is providing this notice?

Obsidian CIO, LLC

## What we do

How does Obsidian CIO, LLC protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also restrict access to your personal information to those individuals who need to know the information to provide services and/or products to you.

How does Obsidian CIO, LLC collect my personal information?

We collect your personal information, for example, when

- Your advisor enters into a sub-advisory relationship with us and provides your account information;
- You or your advisor provides your financial profile information

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Exceed Advisory, LLC.

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Non-affiliated entities include qualified custodians holding client assets and other investment advisers who enter into sub-advisory relationships with us to manage some or all of their end-clients' assets

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- We have no joint marketing agreements.

## Other important information

You may have additional privacy protections under applicable state laws. To the extent state laws apply, we will comply with them when we share information about you. In some cases, state law may give you additional rights to opt out of some information sharing otherwise permitted under this privacy statement.