



## S.A.F.E. Management LLC

REGISTERED INVESTMENT ADVISOR  
745 Hope Road Eatontown NJ 07724  
safeadvglobal.com

## Privacy Policy

### Your Privacy is Important to SAFE Management, LLC

In the course of serving you as an individual client or as someone associated with a corporate or institutional client, SAFE Management LLC may obtain personal information about you. Obtaining this information is important to our ability to deliver the highest level of service to you, but we also recognize that you expect us to treat this information appropriately.

This policy describes the types of personal information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy. As used throughout this policy, the term "Advisor", "firm", and "SAFE" shall mean SAFE Management, LLC.

We place a high priority on the security of your personal information and we have incorporated the General Data Protection Regulation (GDPR) implemented by the European Union on May 25th, 2018. We adhere to these regulations for all customers and distributors regardless of their geographical location or country of origin.

### The Information We Have About You

If you become a client of SAFE as an Individual (e.g. individual advisory services), or as a settlor/trustee/beneficiary of a trust, or as an owner or principal of a company or other investment vehicle established to invest on your behalf or on behalf of your family, etc., the typical information we collect about you would include:

- Your name, address and other contact details;
- Your age, occupation and marital status;
- Extensive financial information, including source of wealth, investment experience and objectives, risk tolerance and, in certain jurisdictions, representations required under applicable law or regulation concerning your financial resources;
- A head and shoulders photograph from, as applicable, your passport, national identity card or driver's license, as required by laws and regulations addressing due diligence and related matters; and
- A personal identifier such as, depending on your country of residence, your Social Security Number, National Identity Card Number
- Insurance Number, Tax File Number, etc.

If you are an employee/officer/director/principal, etc. of one of our corporate or institutional clients, the typical information we collect about you personally would include:

- Your name and contact details;



- Your role/position/title and area of responsibility;
- Certain identifying information (e.g. passport photo, etc.) as required by laws and regulations addressing money laundering and related matters.

Of course, you are not required to supply any of the personal information that we may request. However, failure to do so may result in our being unable to open or maintain your account or to provide services to you. While we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

### Our Use of Your Personal Information

We may use your personal information to:

- Administer, operate, facilitate and manage your relationship and/or account with SAFE Management LLC. This may include sharing such information internally as well as disclosing it to third parties, as described herein;
- Contact you or, if applicable, your designated representative(s) by post, telephone, electronic mail, facsimile, etc., in connection with your relationship and/or account;
- Provide you with information (such as investment research), recommendations, or advice concerning products and services offered by SAFE Management LLC; and
- Facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

If your relationship with SAFE Management, LLC ends, the firm will continue to treat your personal information, to the extent we retain it, as described in this policy.

### Disclosures of Your Personal Information within the Firm

In order to provide efficient and reliable services and to improve product and service options available to you, more than one employee/department may be given access to your personal information. All employees, advisors, and contract personnel of SAFE Management is bound by our Code of Ethics and accept full responsibility of our commitment to our clients. When so sharing your personal information, we adhere to applicable legal and industry standards regarding the protection of personal information.

### Disclosures of Your Personal Information to Third Parties

SAFE Management, LLC does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with SAFE, including those that provide professional, legal or accounting advice to the firm. Non-affiliated companies that assist SAFE in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and



to use your personal information only in the course of providing such services and only for the purposes that dictates. We may also disclose your personal information to fulfill your instructions, to protect our rights and interests and those of our business partners or pursuant to your express consent.

Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

### Business Transitions

In the event the Company goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, the personal information of clients will, in most instances, be part of the assets transferred. If as a result of the business transition, a customer's personally identifiable information will be used in a manner different from that stated at the time of collection, the customer will be given a choice consistent with our notification of changes section.

### Links

The Company's websites may contain links to other sites. Please be aware that the Company is not responsible for the privacy practices of such other sites. We encourage users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by SAFE in all forms: electronic, via phone, handwritten, and facsimile.

### Changes to this Privacy Policy

The Company reserves the right to amend or change this Privacy Policy at any time and at its sole discretion. When material changes or amendments are made to the Privacy Policy, we will announce the release and effective date of the amended Privacy Policy which is typically immediately upon release unless otherwise specified by the Company.

### Privacy and The Internet

The following additional information will be of interest to you if you access SAFE Management, LLC products or services through our website.

Users of SAFE web sites are required to identify and authenticate themselves prior to accessing our services. Generally, identification and authentication take place through the use of your user name and a password. Within such private sites, SAFE uses industry standard encryption technologies to protect your information from external compromise.

Security is a cooperative effort between SAFE and the users of the SAFE web sites. Please remember that your username and password are personal to you and should not be made



available to any other person. Additionally, you should discontinue their use and notify us immediately if you have any reason to suspect that someone else may be using them.

### Privacy Policy Applies to All Data Collected

This privacy policy applies to personal data regardless of the technology used for processing that data – it's technology neutral and applies to both automated and manual processing. It also doesn't matter how the data is stored – in an IT system, through video surveillance, or on paper; in all cases, personal data is protected as defined in this policy.

### User Rights

Your personal information is exclusively yours. If you choose to share information with us as a client, you grant us permission to collect your personal information. We will protect your information as defined in this policy.

You have the right to:

- information about the processing of your personal data;
- obtain access to the personal data held about you;
- ask for incorrect, inaccurate or incomplete personal data to be corrected;
- request that personal data be erased when it's no longer needed or if processing it is unlawful;
- request the restriction of the processing of your personal data in specific cases;
- receive your personal data in a machine-readable format and send it to another controller ("data portability");
- request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

### Questions

Questions regarding this Privacy Policy should be directed to:

[compliance@safeadvglobal.com](mailto:compliance@safeadvglobal.com)

by mail to:

SAFE Management LLC 745 Hope Road, Eatontown, NJ 07724

By phone:

732.272.8852

### Effective Date

The effective date of this Privacy Policy is June 1st, 2018.