

FACTS

WHAT DOES ORIGIN CREDIT ADVISERS, 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 income
- Account balances and account transactions
- Investment experience and transaction 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 Origin Credit Advisers, LLC ("Origin") chooses to share; and whether you can limit this sharing.

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

Questions?

Call 888.534.5914 or go to www.OriginCreditAdvisers.com

Who we are

Who is providing this notice?

Origin Credit Advisers, LLC (“Origin”)

What we do

How does Origin 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.

How does Origin collect my personal information?

We collect your personal information, for example, when you

- Open an account
- Give us your contact information
- Make a wire transfer and tell us where to send the money
- Show us your government-issued ID

We also collect your personal information from other companies, such as our affiliates and the custodians who hold your account assets.

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.

Definitions

Affiliates

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

- *Our affiliates include Origin Investments Group, LLC, Kovitz Investment Group Partners, LLC and other Focus partner firms whose clients invest in private investment vehicles that we manage*

Nonaffiliates

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

- *Origin does not share with nonaffiliates so they can market to you.*

Joint marketing

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

- *Origin does not jointly market.*