

IMPORTANT INFORMATION ABOUT PRIVACY AND CERTAIN INFORMATION SHARING

Protecting Your Privacy

This notice applies to individuals who obtain or apply for a financial product or service for personal, family, or household purposes, or have done so in the past, from Ivy Asset Management LLC or any of its subsidiaries and affiliates. It describes our policies and practices for collecting, disclosing, and safeguarding “nonpublic personal information,” which may include financial or other customer information.

This notice replaces all previous notices of our consumer privacy policy, and may be amended at any time. We’ll keep you informed of changes as required by law.

INFORMATION WE COLLECT AND SHARE

We collect a variety of nonpublic personal information about you, which may include:

- Information we receive from you, as provided, for example, on applications or other forms.
- Information about your transactions with us, our affiliates, and others. (Our affiliates include financial service providers such as banks, securities broker-dealers, investment advisors, insurance agencies, and transfer agents.)
- Other information we receive from affiliates and nonaffiliated third parties.

We disclose this information only as required or permitted by law. For example, we may share information with affiliates or nonaffiliated third parties that provide services to us, in order to process your transactions and service your accounts. We may also share information with those who perform marketing services on our behalf, or financial institutions with whom we have joint marketing agreements that provide for the confidentiality and security of customer information. When necessary, we also disclose customer information to regulatory agencies, law enforcement agencies, courts, or parties to lawsuits.

CONFIDENTIALITY AND SECURITY OF NONPUBLIC PERSONAL INFORMATION

We are careful to restrict access to your nonpublic personal information. Our employees, and in certain cases nonaffiliated third parties, have limited access to customer information based on their responsibilities. This access enables them to assist you in completing transactions, offer you additional financial services, and resolve any customer service issues that may arise. All employees are instructed to follow the confidentiality guidelines provided in our Code of Conduct, which is strictly enforced. We maintain physical, electronic, and procedural safeguards that comply with federal standards to safeguard nonpublic personal information.