



# PRIVACY POLICY

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INVEST WITH CLARITY™

## Nepsis, Inc. Privacy Policy

To be successful in an environment rapidly being shaped by technology, we must continue to insure our clients are confident we will manage their financial affairs professionally and confidentially. Nepsis, Inc. ("Nepsis") collects personal, private information from its clients in order to determine the client's specific investment goals and objectives. This information helps us determine how to adequately provide our services as discussed in our disclosure documents.

The safeguarding of client information is an issue we take seriously and we want to assure all of our clients whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Policy.

**Recognition of a Client's Expectation of Privacy:** We consider client privacy to be fundamental to our relationships with clients. And while information is critical to providing quality services, we recognize one of our most important assets is our clients' trust. We are therefore committed to maintaining the confidentiality, integrity and security of clients' personal information.

**Use, Collection and Retention of Client Information:** Nepsis limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality services, and offer products, services and other opportunities of interest to our clients. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, driver's license numbers, date of birth, employment status, annual income and net worth.

**Maintenance of Accurate Information:** Nepsis recognizes it must maintain accurate client records. The above referenced information is collected at the inception of your relationship with Nepsis. We request you review any information provided to you related to your advisory account and notify us promptly at (952) 746-2003 upon the discovery of erroneous information so we may correct it immediately.

**Limiting Employee Access to Information:** We restrict access to your non public personal information to those employees who need to know this information to provide services to you. All Nepsis employees are trained regarding the importance of maintaining client confidentiality and on these Privacy Principles. Employees who violate these Privacy Principles will be subject to disciplinary measures.

**Protection of Information via Established Security Procedures:** Nepsis recognizes that a fundamental element of maintaining effective privacy procedures is to provide reasonable protection against unauthorized access to client information. Therefore, we maintain physical, electronic and procedural safeguards to protect against unauthorized access to client information.

**Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Nepsis places strict limits on who receives specific information about client accounts and other personally identifiable data. Nepsis may share information with such companies if they provide a product or service that may benefit our clients. Whenever we do this, we carefully review the company and the product or service to make sure it provides value to our clients.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our clients; in the normal course of our business (for examples, with broker-dealers, consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a client.

**Maintaining Clients Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist the third party keep such information confidential, consistent with the conduct of our business relationship.

**Disclosure of Privacy Principles to Clients:** It is our policy to respect the privacy of our clients and to protect the personal information entrusted to us. As a result of our commitment to this policy, we have developed these Privacy Principles which are made readily available to our clients. Should you have questions about these Privacy Principles or about the privacy of your client information please call Mark Pearson at (952) 746-2003.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time. Under such circumstances, we will provide you with an updated set of policies, and will provide adequate time for you to opt out of any information sharing arrangement. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.



For more information contact:

**Nepsis, Inc.**

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