



Privacy Policy

Rapidan Capital, LLC d/b/a ValueAligned® Partners (“VAP”) has always valued the trust our customers have placed in us, and we are committed to the responsible management, use, and protection of our customers' personal information. We are proud of our privacy and confidentiality practices, and we want you to know how we protect your information. Please take a moment to review our Privacy Policy, as described below.

Gathering Information

We treat the information we gather about you in a confidential manner. **VAP** collects information about you to help us serve your financial needs, administer and update accounts, reduce fraud and other risks, provide customer service, offer new products or services, and fulfill legal and regulatory requirements. Any collection of personal information is to support our normal business operations and service your account.

In order to service your account, **VAP** may collect nonpublic personal, financial and health information from the following sources:

- Information on applications and related forms, or provided by you in person or over the phone, such as name, address, Social Security number, marital status and assets and income;
- Information collected from your browser, when you visit our web-site and your browser interacts with us;
- Information regarding your transactions with us, our affiliates or others, such as trades, wire transfers or checks, and account balances;
- Information from your employer, association, benefit plan sponsor, consumer reporting agencies, or other institutions where you conduct financial transactions, such as name, address, Social Security number, assets and income.

Sharing Information

VAP does not disclose any nonpublic personal information about you to anyone, except as permitted or required by law. However, in the course of servicing your account, we may share previously described information about our customers with other service providers such as affiliated broker-dealers like Folio Institutional, banks, investment firms, or technical application providers, as needed, to effect transactions, provide account maintenance or customer service to your account. We may also disclose your information to other organizations as permitted by law such as government agencies and law-enforcement officials (for example, for tax reporting, or under court order), or to other organizations and individuals with your consent (for example, to your attorney or tax professional).

Safeguarding Privacy

VAP maintains physical, electronic, and procedural safeguards to guard your nonpublic personal information, to ensure that we are complying with our own policy, industry practices, and federal regulations. We emphasize the importance of information security through our Privacy Policy, and the contracts and agreements that we sign with external suppliers and partners. We safeguard information by regularly assessing security standards and procedures to protect against unauthorized access to personal information. Should you ever decide to terminate your

relationship with us, you can be assured that your information will continue to be treated according to the privacy policies and practices as described in this notice.

Note: **VAP** will notify customers of our privacy policy at the inception of our business relationship and annually thereafter. **VAP** reserves the right to change this Privacy Policy at any time, without notice. **VAP** will notify customers of any modifications on an annual basis. If **VAP** changes its policy to offer non-public personal information to non-affiliated third parties other than for the reasons mentioned above, **VAP** will provide its customers with an option to exclude their data from inclusion in this information sharing program and certain disclosures may require us to get an "opt in" or "opt out" from you. If this is required, we will do so before information is shared.

This Privacy Policy applies to **Rapidan Capital, LLC d/b/a ValueAligned® Partners**, a New Jersey state registered investment advisory firm.