



PRIVACY POLICY

The Gantzert Investment Company (“Gantzert” or the “Firm”) Privacy Policy explains how Gantzert handles your confidential information, whether you are a current or former client. It is designed in accordance with Regulation S-P, which the SEC adopted from Section 504 of the Gramm-Leach-Bliley Act.

Item 1

You provide Gantzert with information, directly and indirectly, that is inherently private and personal in nature (“nonpublic personal Information”). Gantzert is committed to maintaining the confidential nature of such information. For example, Gantzert may collect such nonpublic personal information about you from the following sources:

- 1) Information received from you in written agreements, applications, or other documents and forms;
- 2) Information received from you verbally in the regular course of providing services to you; and
- 3) Information gathered from your assets or transactions with Gantzert or others.

Item 2

Gantzert implements the following procedural, physical, and electronic safeguards for the protection of your information:

- 1) Gantzert restricts access to nonpublic personal information to those employees who need the information in order for Gantzert to provide its services to you;
- 2) Gantzert secures hard copies of nonpublic personal information from unauthorized persons by shredding unnecessary documents and by securing its physical office at each close of business;
- 3) Gantzert protects electronic data containing nonpublic personal information from unauthorized persons through password protection, firewall security, and other technology-security measures; and
- 4) Gantzert takes care to avoid unauthorized persons from overhearing or intercepting conversations involving nonpublic personal information.

Item 3

Gantzert may disclose nonpublic personal information to the following types of unaffiliated third parties:

- 1) Outside entities or persons that use the information to help Gantzert provide its services to you. Such entities may include GreatBanc, Advent, Global Relay Inc., or others;
- 2) Regulatory authorities or law enforcement entities that have jurisdiction over Gantzert, but only as required by U.S. or other applicable laws, regulations, or rules;
- 3) Outside entities that may assist Gantzert in the prevention of fraud; and
- 4) Other outside entities or persons, such as mortgage lenders, accountants, attorneys, and insurance agents, but only with your authorization.

If you have any questions regarding Gantzert’s Privacy Policy or its policies and procedures, please contact Mike Wolcott, Gantzert’s Managing Principal and Chief Compliance Officer, at 312.399.0828 or mwolcott@gantzertinvco.com.