

## BREAKWATER INVESTMENT MANAGEMENT, LLC

### INITIAL NOTICE OF PRIVACY PRACTICES

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Breakwater Investment Management, LLC, an investment advisory firm, is committed to safeguarding the confidential information of its clients. We do collect nonpublic personal information to provide you with accurate and pertinent financial advice. We hold all nonpublic personal information you provide to us in the strictest confidence. If we were to change our firm policy, we would be prohibited under the law from doing so without advising you first.

You may direct us not to make disclosures (other than disclosures required by law) regarding nonpublic personal information to nonaffiliated third parties. If you wish to opt out of disclosures to non-affiliated third parties, please contact us at (206) 621- 8832.

Breakwater Investment Management, LLC collects personal information about you from the following sources:

- Applications or other forms.
- Discussions with nonaffiliated third parties.
- Information about your transactions with us or others.
- Questionnaires.
- Tax Returns.
- Estate Planning Documents.
- Insurance Policies.

Breakwater Investment Management, LLC uses your personal information in the following manner:

- We do not share, sell, or disclose your personal information to third parties without your explicit consent, except where required by law. Your information is kept confidential and used solely for the purposes you have agreed to.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties

as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)

- In general, we do not use texting as a means of communicating with clients. If we send you a text message, you have the right to opt out of receiving text messages from Breakwater at any time. To opt out, you can reply "STOP" to any text message you receive from us. By providing your phone number and opting in to receive text messages, you consent to the collection and use of your personal information as described in this policy. We ensure that your consent is obtained explicitly, and you are informed about the types of messages you will receive.

- We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt out of such disclosure.

- For nonaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.

- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws.