

## Privacy Notice

Stratton Capital Investment Advisory LLC (“Stratton”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ non-public personal information and records such as personal background, investment objectives, financial situation, tax information, tax returns, investment holdings, account numbers, account balances, transactions, etc (“Information”).

Through this policy and its underlying procedures, Stratton attempts to secure the confidentiality of the Information and protect it against anticipated threats or hazards. It is the policy of Stratton to restrict access to all current and former clients’ Information to those employees and affiliated entities and service providers who need to know that information in order to provide products or services to the client.

Stratton may disclose the client’s Information if Stratton is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with Stratton, including, but not limited to the client’s other professional advisors and/or service providers such as attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc; (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by Stratton in order to facilitate the commencement, continuation, or termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for Stratton (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Stratton permits only authorized employees and affiliates who have signed a copy of Stratton’s Privacy Policy to have access to client information. Employees violating Stratton’s Privacy Policy will be subject to Stratton’s disciplinary process. Additionally, whenever Stratton hires other organizations to provide services to Stratton’s clients, Stratton will require them to sign confidentiality agreements and/or the Privacy Policy.