



## Notice of Privacy Practices

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### Our Commitment to Your Privacy

Protecting clients' privacy is of paramount importance to Robasciotti & Associates Inc, DBA Adasina Social Capital (the "firm" or "Adasina"). It is Adasina's policy that no private client financial information obtained by the firm is sold or made available to third parties except that:

- Third parties may be used by the firm to assist in the management or maintenance of client accounts (such as a custodian, broker, or bank).
- Client information may be released to client's accountancy, legal, and other third-party representatives at client's direction.
- Client information may be released in accordance with applicable laws and regulations.

The firm will not share non-public personal information about its clients with non-affiliated third parties without prior client consent, except for specific purposes described below. This notice explains the firm's collection, use, and safeguarding of client information.

### How Adasina Gathers Information

In connection with providing services, the firm may obtain information about its clients from the following sources:

- Client agreements and other information that clients provide to the firm, whether in writing, in person, by telephone, electronically, or by any other means, this information may include a client's name, address, phone number, email address, social security number, employment information, income, investment experience, and credit references;
- Tax returns provided by the client;
- Investment information that may include account balances, positions, investment transactions, and history;
- Consumer reporting agencies, this information may include account information and credit history; and
- Public sources.

### Sharing Information with Nonaffiliated Third Parties

The firm only discloses non-public client information to non-affiliated third parties when it is believed necessary for the firm's services to clients or as required or permitted by law, such as:

- If clients request or authorize the disclosure of the information;
- To provide client investment services or account maintenance and trading;
- To respond to a subpoena or court order, judicial process, law enforcement, or regulatory authorities;
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of the firm's business or an operating unit;
- To help prevent fraud;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- To comply with federal, state, or local laws, rules, and other applicable legal requirements; and
- Pursuant to any other exceptions enumerated in the California Financial Information Privacy Act.



Adasina does not make any disclosure of client non-public personal information to other companies who may want to sell products or services to clients. For example, the firm does not sell client lists and the firm will not sell client names to marketing companies.

## Use of Third Party Electronic Platforms

The firm is aided in its ongoing investment monitoring and management services by the use of third-party portfolio and trade data management software and services provided by the custodian of the client's account and others, as applicable. Such third-party services provide linked access to client custodial accounts and trade activity and provide "cloud" storage of such data on their secure, internal computer servers on behalf of the firm. We only share non-public client information with non-affiliated third parties when we believe it necessary for our services to clients or for investment services, account maintenance and trading.

## Opt-In / Opt-Out Provision

If, at any time in the future, it is necessary to disclose any client personal information in a way that is inconsistent with this policy, Adasina will give its clients advance notice of the proposed disclosure so that they will have the opportunity to either opt-in or opt-out of such disclosure, as required by applicable law. Clients are advised that the firm believes that sharing client private information under the circumstances noted above is either mandated by law or necessary for the firm to conduct its business and to best service clients. Clients desiring to opt out of any third-party disclosures should contact the firm immediately. Opting out may necessitate that we terminate our client agreement.

## To Whom This Policy Applies

This Privacy Policy applies to individuals who obtain or have obtained services for personal, family, or household purposes from Adasina Social Capital.

## Former Clients

This Notice of Privacy Practices continues to apply to all former clients.

## Our Security Practices & Information Accuracy

Adasina takes steps to safeguard client information. Access to the personal and account information of clients is restricted to its employees and agents for business purposes only. The firm maintains physical, electronic, and procedural safeguards for personal information. Additionally, the firm has internal controls to keep client information as accurate and complete as possible. If clients believe that any information is not accurate or potentially compromised, please contact the firm.

## Other Information

Adasina reserves the right to change this Notice of Privacy Practices. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. If you have any questions about this Privacy Policy, please contact our office at (415) 986-5500 or [compliance@adasina.com](mailto:compliance@adasina.com).