

Elpis Privacy Policy

Elpis Capital Group, LLC (“Elpis”) is committed to respect the individual privacy of its consumers. In accordance with federal regulations, Elpis is giving you this notice to disclose how Elpis uses information about you.

As an Elpis client, you have entrusted your personal and financial data to its care. Elpis recognizes that your relationship is based upon trust, and that you expect Elpis to act responsibly and in your best interest. Because your personal and financial data is your private information, Elpis holds itself to the highest standards in its safekeeping and use. This means most importantly, that Elpis does not sell client information — whether it is your personal information or the fact that you are an Elpis client — to anyone. Instead, your information is used primarily to facilitate your investment transactions with Elpis’s fund.

Elpis obtains personal information about you from the following:

Information received from you, such as information on subscription documents or other forms that may include your name, address, social security number, birth date, assets, income, and net worth.

Information about your transactions with its affiliate, Wolfrum and Company, LLC, such as your account balances and investment activities.

As emphasized above, Elpis does not sell information about current or former investors to third parties. Nor does it share such information, except when needed to complete transactions at your request or to make you aware of related services. Here are the details:

In order to complete certain transactions or to provide you with the financial information or services, it may be necessary to provide nonpublic personal information to companies, individuals, or groups that are, or are not, affiliated with Elpis.

To alert you to other services, Elpis may share your information within Elpis affiliated companies.

Elpis may contract with non-affiliated companies to perform services. Where necessary, Elpis will disclose information it has about you to these third parties. In all such cases, it provides the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. Elpis requires these third parties to treat your private information with the same high degree of confidentiality.

Finally, Elpis will release information about you if you direct it to do so, if compelled by law to do so, or in other legally limited circumstances. For example, Elpis may share personal information about you to protect your account(s) from fraud, respond to a subpoena, or service your investment.

Elpis maintains strict physical, electronic, and procedural safeguards to comply with federal standards to guard your nonpublic personal information.

As required by federal law, Elpis will notify you of its privacy policy annually. It reserves the right to modify this policy at any time, but you may rest assured that if this policy has material changes, Elpis will notify you promptly. If you have questions pertaining to this policy, please contact Elpis’s compliance consultant, Susan E. Mitchell at sem19@att.net.