

# STONE RUN CAPITAL, LLC

## Privacy Policy

March 2019

### *Protecting the Privacy of Client Records and Information*

Stone Run Capital, LLC is committed to upholding the interests of our clients. For this reason, we keep personal information as confidential as possible for the general welfare of our clients. Stone Run Capital, LLC will not disclose personal information to anyone unless it is:

- Required by law
- At the direction of the clients
- Necessary for providing the best service to the client

Stone Run Capital, LLC has not and will not sell personal client information to anyone for any reason.

### *Client Profile Information*

In order to manage our client accounts properly, Stone Run Capital, LLC collects and maintains certain types of information, including the following:

- Information we receive from the client upon opening an account
- Information we generate to service our client accounts
- Information related to the allocation of gains and losses, and fees and income generation
- Information we receive from third parties with respect to our client accounts, such as trade confirmations from brokerage firms

### *Who Receives Information*

In order to manage our client accounts properly, Stone Run Capital, LLC may also disclose limited aspects of a client's personal information to the following:

- The Securities and Exchange Commission and/or other government or regulatory entities (all records subject to examination during audits)
- Brokers (for trading purposes)
- Stone Run Capital, LLC auditor and attorneys (in reviewing billing and receivables, contracts, etc.)
- Consultants and other intermediaries upon client request or approval

### *Protection of Information*

Stone Run Capital, LLC maintains certain safeguards to ensure that our clients' personal information is protected now as well as into the future, including closed accounts. These safeguards include enforcing policies that physically and electronically keep client information safe, and allowing only those employees needing personal information for their job completion to have access to it, with the understanding that it is to be regarded in strictest confidence.

In compliance with SEC Regulation S-P, a copy of this privacy statement is provided to each client upon entering into an advisory or limited partnership agreement with Stone Run Capital and is provided to all clients on an annual basis. Anyone with questions or requests for additional information may contact: Donna Martineau, Operations Manager, at 646-701-6087 or [dmartineau@stoneruncapital.com](mailto:dmartineau@stoneruncapital.com).

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