

The Randolph Company
PRIVACY POLICY DISCLOSURE

Thank you for your decision to invest with The Randolph Company (“RCO”). RCO respects your privacy and only collects the information we need to service your account and administer our business. We are committed to keeping your information confidential and we place strict limits and controls on the use and sharing of your information.

<p>What does RCO do with your personal information?</p>	<p>As a registered investment adviser, RCO must comply with SEC Regulation S-P, which requires registered advisers to adopt policies and procedures to protect the nonpublic personal information of natural person consumers and clients and to disclose to such persons, policies and procedures for protecting that information.</p>
<p>What types of information does RCO collect?</p>	<p>The types of nonpublic personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Information we receive from you through applications or other forms, correspondence, or conversations, including, but not limited to, your name, address, phone number, social security number, assets, income and date of birth • Information about your transactions with us, our affiliates, or others, including, but not limited to, your account number and balance, payment history, parties to transactions, cost basis information, and other financial information.
<p>How does RCO protect your information?</p>	<p>To fulfill our privacy commitment, we have instituted firm-wide practices to safeguard your personal information:</p> <ul style="list-style-type: none"> • We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information, to ensure that we are complying with our own policy, industry practices, and federal regulations. • We restrict access to nonpublic personal information about you to authorized employees who need the information to administer your business. • We do not disclose nonpublic personal information about our current or former clients to nonaffiliated third parties, except in the following circumstances: <ul style="list-style-type: none"> ○ As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account. ○ As required by regulatory authorities or law enforcement officials. ○ To the extent reasonably necessary to prevent fraud and unauthorized transactions. ○ Upon consent from the client. • We do not participate in third party services that may collect personally identifiable information about your online activities over time or across different websites when using our website. • We do not respond to browsers “do not track” signals or other mechanisms regarding the collection of personally identifiable information about your online activities over time or across different websites when using our website. • Should your relationship end with RCO, your nonpublic personal information will remain protected in accordance with our privacy practices outlined in this policy. • Annually, we provide a copy of our Privacy Policy Disclosure to clients.