

## Broad Run Investment Management, LLC

### Privacy Policy Notice

Broad Run Investment Management, LLC respects the privacy of all clients and prospective clients (“customers”), both past and present. It is recognized that you have entrusted the firm with non-public personal information and it is important that all firm access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information clients provide to complete our investment questionnaire;
- Information clients provide in engagement agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts;
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about client transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our clients have requested;
- When our customers have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to staff that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed to not discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse’s IRA account or to adult children about parents’ accounts, etc.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide you with its privacy policy on an annual basis per federal law and at any time, in advance, if firm privacy policies are expected to change.

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If you have additional questions about our Privacy Policy, you may contact us at our office at the phone number below or via email at [drainey@broadrunllc.com](mailto:drainey@broadrunllc.com)

Broad Run Investment Management, LLC  
1530 Wilson Boulevard | Suite 1020 | Arlington, Virginia 22209  
O: (703) 260-1260 | F: (703) 574-4312 | [www.broadrunllc.com](http://www.broadrunllc.com)

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