

FACTS

WHAT DOES GAIA CAPITAL MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?



Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and employment information
- assets and income
- account balances and transaction history

How?

All financial companies need to share their clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Gaia Capital Management, Inc. (hereinafter referred to as "Gaia") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Gaia share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations	Yes	No
For our marketing purposes —to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes —information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes —information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?

Call us at 800-395-6636 or 503-324-4040 (local) or email us at: vivian.lopez@gaiacapital.com or jim.pursley@gaiacapital.com

Who we are**Who is providing this notice?****Gaia Capital Management, Inc.****What we do****How does Gaia protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We also restrict access to non-public personal information about you to those employees who have a need to know such information.

How does Gaia collect my personal information?

We collect your personal information, for example, when you

- open an account or provide account information
- make deposits or withdraw funds from your account
- seek advice about your investments

We also collect your personal information from others, such as affiliates or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes— information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account.

Definitions**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Gaia does not share your information with affiliates.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Gaia does not share with nonaffiliates to market to you.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Gaia does not jointly market.

Other important information

We may disclose personal information to those companies that help us process or service your account, including trust companies and brokerage firms, which you have provided authorization to.