



Privacy Policy

Belle Isle Advisors, LLC ("Belle Isle," "BIA," "we," "us," or "our") is committed to protecting the confidentiality and security of personal information entrusted to us by our clients, prospective clients, and others. This Privacy Policy describes how we collect, use, share, and safeguard nonpublic personal information in accordance with applicable federal and state laws, including Regulation S-P.

1. Scope and Applicability

This Privacy Policy applies to:

- Current and former clients of Belle Isle Advisors, LLC;
- Prospective clients who provide personal information to us;
- Individuals associated with entities to whom we provide advisory or consulting services.

This Policy applies to information obtained in connection with providing investment advisory, consulting, and related professional services.

2. Information We Collect

We may collect nonpublic personal information about you from the following sources:

(a) **Information you provide to us**, including but not limited to:

- Account applications and onboarding materials;
- Advisory or consulting agreements;
- Questionnaires, intake forms, or correspondence;
- Financial statements or documents you choose to provide.

(b) **Information we generate or obtain in the course of providing services**, such as:

- Portfolio information and account records;
- Communications with you (email, written correspondence, meeting notes);
- Analytical work product created on your behalf.

(c) **Information received from third parties**, including:

- Custodians (e.g. brokerage firms or account platforms);
- Service providers you authorize us to work with (accountants, attorneys, administrators);
- Publicly available sources, where relevant.

3. How We Use Information

We use nonpublic personal information solely for legitimate business purposes, including:

- Providing investment advisory or consulting services;
- Administering and servicing client accounts;
- Communicating with you regarding your relationship with Belle Isle;
- Complying with legal, regulatory, and contractual obligations;



- Maintaining internal books, records, and compliance controls.

We do **not** sell or rent client information to third parties.

4. Information Sharing and Disclosure

We may disclose nonpublic personal information only as permitted or required by law, including:

- To service providers that perform services on our behalf (e.g. custodians, technology providers, compliance, or accounting professionals), provided such parties are subject to confidentiality obligations;
- To professional advisors (such as attorneys or accountants) where necessary to provide services requested by you or to protect our legal interests;
- As required by law or regulation, including in response to lawful requests by regulators, courts, or governmental authorities;
- With your consent or at your direction.

We do **not** disclose nonpublic personal information to unaffiliated third parties for marketing purposes.

5. Information Safeguards

Belle Isle maintains physical, electronic, and procedural safeguards designed to protect nonpublic personal information, including:

- Secure cloud-based document storage and email systems;
- Restricted access to client information on a need-to-know basis;
- Use of multi-factor authentication and device security controls;
- Policies governing data retention, access, and disposal.

We regularly review our information security practices and update them as appropriate.

6. Data Retention

We retain client information for as long as necessary to:

- Provide services;
- Comply with applicable legal and regulatory requirements;
- Maintain required books and records.

Information is disposed of securely when no longer required.

7. Former Clients

If you are no longer a client of Belle Isle, we will continue to treat your nonpublic personal information in accordance with this Privacy Policy.



8. Changes to This Policy

We may amend this Privacy Policy from time to time. Any material changes will be provided to clients as required by law.

9. Contact Information

If you have questions about this Privacy Policy or our privacy practices, please contact:

Belle Isle Advisors, LLC
2222 Belleview Terrace
Oklahoma City, OK 73112
jwh@belleisleadvisors.com
(405) 233-8158

This section forms part of the Firm's Policies and Procedures Manual and is subject to the Global Firm Adoption set forth herein.