



ACCOLADE

ASSET/LIABILITY ADVISORY SERVICES

PRIVACY POLICY OF ACCOLADE INVESTMENT ADVISORY, LLC

PURPOSE

Accolade strongly believes in protecting the confidentiality, security, and integrity of nonpublic personal information received from our clients. This Privacy Policy ("Privacy Policy") provides a framework that ensures this protection and provides privacy governance for Accolade Investment Advisory, LLC ("Accolade").

Accolade is established pursuant to the legal requirements mandated by the State of Florida for limited liability companies as well as the National Credit Union Administration's ("NCUA") requirements for forming and operating a Credit Union Service Organization ("CUSO").

SCOPE

This policy applies to all business functions, officers and staff, including back-up support personnel. Accolade provides Investment Advisory Services to clients, on a non-discretionary basis including consulting, security analysis, trade recommendations, investment management assistance, reporting, security safekeeping, bond accounting and economic analysis pertinent to the financial portfolio management process.

DEFINITIONS

"Third Party" means any company or organization that is not an affiliate of Accolade.

"Affiliates" include Corporate One Federal Credit Union ("Corporate One") and its Credit Union Service Organizations ("CUSOs").

DECLARATIONS

Accolade will never sell or share nonpublic information with non-affiliated third parties, except where required to open an account, to process transactions, to

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advise the client about our products and services, and to provide customer service. Accolade will also adhere to the following;

1. We may disclose information to our affiliates, in the course of providing our services, in order to assist us in serving our client's financial needs.
2. We may be required to disclose nonpublic information to regulators or law enforcement authorities when requested as a function of their duties.
3. We require any third party company we hire to provide support services to protect, keep confidential, and restrict the use of nonpublic information except for the purpose(s) for which they have been hired.
4. We assure that the information we have about our clients is accurate and highly confidential and should only be available to persons who have a need for the information to properly service our client's account, act upon a client's request or to fulfill that person's job responsibility within our company.
5. We restrict access to nonpublic information to those employees with a legitimate business need for the information.
6. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard our clients' nonpublic information.
7. We do not use nonpublic information about any client's members for any purpose other than those purposes for which the client disclosed the information to us, including servicing and processing transactions, and providing financial and/or advisory services in the normal course of business. Non public personal information, such as GLBA data, is not required for Accolade's services and should not be provided by the client.
8. We use security measures that we deem to be appropriate for the protection of nonpublic personal information with particular attention to protection against unauthorized access to or unauthorized use of such information that could result in substantial harm or inconvenience to a client.
9. We will make available, upon client's request, the client's information deemed by us to be appropriate as to the security measures, controls, systems, and procedures that we use for the protection of nonpublic personal information.
10. We will take actions that we deem to be appropriate, including notification to the client as soon as possible of any incident that occurs that involves unauthorized access to or unauthorized use of a client's nonpublic information.
11. We use security measures designed to accomplish the proper disposal of nonpublic information held by us.
12. We will continue to utilize security measures designed to protect the information against unauthorized access and against unauthorized use if immediate deletion or disposal of the nonpublic information held by us is not feasible, until such date when the deletion or disposal of the information occurs.



DISCLAIMERS

The law permits us to share your identifying information and information about your transactions with third parties for the purposes described above. We do not share your information with third parties for any other reasons. Therefore, we are not providing an opt-out provision for information shared with third parties.

The law permits us to share your identifying information and information about your transactions with our affiliated parties. Unless you tell us not to, we may share other information with our affiliates, including information we receive from you on applications and other forms, or information we receive from a consumer reporting agency. If you prefer that we not share these kinds of information with our affiliates, you may direct us not to share this information by contacting our office at the following number: (866) 537-7302.

If you have any questions concerning our Privacy Policy to protect your nonpublic personal information, please feel free to call us at the number listed above.

