



## **Privacy Statement**

Tributary Capital Management, LLC recognizes our obligation to keep information secure and confidential. We want you to know our policies for protecting nonpublic, institutional and personal (client), information for parties contracting with us for investment management. Nonpublic, client information includes but is not limited to: information pertaining to accounts, transactions, payment history, financial positions, and information obtained from credit reporting agencies.

### **Commitment to Integrity and Clients**

The employees of Tributary Capital Management are bound by a code of ethics. Access to non-public, client information is restricted to employees who need to know that information to provide products or services. Specific procedures have been developed to safeguard client information and comply with government standards.

### **Service of Investment Management Agreements**

To provide the highest quality investment management certain information is required. Nonpublic information is collected from the following source:

- Information received on investment management agreements such as the institution's name, address, tax-identification number, an individual's address, social security number, assets, and income.

### **Shaping the Landscape of Investment Management Relationships**

Nonaffiliated third parties perform services or functions on Tributary Capital Management's behalf. The services a nonaffiliated third party may perform may include servicing client accounts and marketing products or services. In connection with these activities, we may disclose the information we collect to companies that perform services on our behalf.

Except for these few instances, Tributary Capital Management does not disclose nonpublic client information to nonaffiliated third parties, except as permitted by law. We may, however, share information with nonaffiliated third parties if we have consent.

### **Information We Can Share With Our Corporate Family**

As permitted by law, we may share information relating to transactions or experiences with us with other members of our corporate family.