



TRITON
INVESTMENTS

*Triton Investments, LLC
Written Privacy Policy
Effective Date: August 10th, 2023*

Privacy Policy

The privacy policy statement is given to clients at the initial signing of the client contract and mailed or emailed with client consent once annually, if the policy is updated. The CCO will document the date the privacy policy was delivered to each client for each year if an annual delivery is required. TIL collects non-public personal information about clients from the following sources:

- Information it receives from them on applications or other forms;
- Information about their transactions with TIL or others; and
- Information it receives from a consumer reporting agency.

Below are the reasons for which TIL may share a client's personal information.

- For everyday business purposes - such as to process client transactions, maintain client account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For marketing by TIL - to offer TIL's products and services to clients;
- For joint marketing with other financial companies;
- For affiliates' everyday business purposes - information about client transactions and experience; or
- For non-affiliates to market to clients (only where allowed).

If a client decides to close his or her account(s) or becomes an inactive customer, TIL will adhere to the privacy policies and practices as described in this written Privacy Policy, as updated.

TIL restricts access to clients' personal and account information to those employees who need to know that information to provide products or services to its clients. TIL maintains physical, electronic, and procedural safeguards to guard clients' non-public personal information.

The names of TIL's current and former access persons can be found in *Exhibit 2*.

In addition to TIL's listed access persons, any IT persons or other technical consultants employed at the firm may also have access to non-public client information at any time. An on-site or off-site server that stores client information, third-party software that generates statements or performance reports, or third-party client portals designed to store client files all hold the potential for a breach of non-public client information.

To mitigate a possible breach of the private information, TIL uses encryption software on all computers and carefully evaluates any third-party providers, employees, and consultants with regard to their security protocols, privacy policies, and/or security and privacy training.

The system is tested and monitored at least quarterly.

The test conducted by the CCO will include the following activities:

- Attempt to access a random sample of firm devices to ensure that proper passwords are in place to prevent access;
- Attempt to access users' accounts with the proper password to ensure that two-factor authentication prevents system access if available; and

- Attempt to restore a sample of files and records to ensure that the restoration process is sufficient and properly configured.

The results from the annual test will be documented and utilized as an opportunity to update the Information & Cybersecurity Policy.

Staff Training

On an annual basis, TIL will conduct a firm-wide training session to ensure that staff members are properly trained and equipped to implement the above policies. New staff members will receive training, led by the CCO, within 1 month of their initial hire date.

TIL uses various methods to store and archive client files and other information. Third party services or contractors used have been made aware of the importance TIL places on both firm and client information security. In addition to electronic and personnel measures TIL has implemented reasonable physical security measures at its home office location.

TIL will retain records for at least 5 years after the year in which the record was produced, or as otherwise required by law. With respect to disposal of non-public personal information, TIL will take reasonable measures to protect against unauthorized access to or use of such information in connection with its disposal.

Chief Compliance Officer Appointment (Exhibit 1)

The person herein named "Chief Compliance Officer" is stated to be competent and knowledgeable regarding the Advisers Act or applicable state rule or regulation and is empowered with full responsibility and authority to develop and enforce appropriate policies and procedures for the firm. The compliance officer has a position of sufficient seniority and authority within the organization to compel others to adhere to the Privacy Policy.

Chief Compliance Officer	Date Responsibility Assumed	Annual Review Completed	Employee Training	Privacy Policy Updates:	Updates Notes:	
Charles M Coleman	6/20/2018		12/13/2018	07/17/2018		
			08/16/2019	08/16/2019	01/11/2019	
					08/16/2019	
					12/31/2019	
					03/31/2020	
					04/15/2020	
					05/07/2020	
				05/20/2020	Testing changed to 'quarterly' Added Chief Compliance Officer Appointment and Table Access Person List Attached MyRIACompliance Log Attached for Reference	
			08/12/2020	05/29/2020	09/13/2021	Updated Access Persons
			09/13/2021			
		09/09/2022	See RIA in a Box Report	09/09/2022	Annual Review	
		08/10/2023	See RIA in a Box Report	08/10/2023	Annual Review	

DocuSigned by:
Signature of Chief Compliance Officer:

Charles Coleman
Name
6D307AE33CD3495...

08-10-2023
Date

List of Access Persons (Exhibit 2)

Access Person: Any of TIL's supervised persons who have access to non-public information regarding any client's purchase or sale of securities, or information regarding the portfolio holdings of any reportable fund, or who is involved in making securities recommendations to clients, or who has access to such recommendations that are non-public.

The following employee(s) will manage non-public information:

Name	Title
Charles Mark Coleman	CEO
Patrick Thomas Schmitz	IAR
William Raymond Sherwin	IAR

MyRIACompliance Example Log

5/18/2020

MyRIACompliance Compliance Log

Triton Investments, LLC

MyRIACompliance Compliance Log on 05/18/2020

Q3 2020 Compliance Activities

Registration Changes

FIRM REGISTRATIONS

There are no Firm Registration Status updates to show for this period.

INDIVIDUAL REGISTRATIONS

There are no Individual Registration Status updates to show for this period.

ADV CHANGES

There are no closed Change Requests to show for this period.

* Date Case Closed

Risk Assessment

2020 Risk Assessment

Not Complete

Compliance Calendar

DEADLINE ACTIVITIES

There are no completed Deadline Activities to show for this period.

EXPECTED ACTIVITIES

There are no completed Expected Activities to show for this period.

RIA EDUCATION

There are no completed RIA Education activities to show for this period.

CUSTOM ACTIVITIES

There are no completed Custom Activities to show for this period.

Marketing & Document Review

There are no completed Marketing & Document Reviews to show for this period.

* Date Review Initiated

Attestation Documents

There are no uploaded Attestation Documents to show for this period.

* Date Archived

Reviews & Submissions

There are no completed Attestation Activities to show for this period.

Dismissed Reviews & Submissions

There are no dismissed activities to show for this period.

Activity Requests

There are no completed activities to show for this period.

Employee Reports

There are no reports to show for this period.

Trade Monitoring

HOLDINGS
There are no Holdings Reports to show for this period.

TRANSACTIONS
There are no Transactions for this period.

ACCOUNTS
There are no Accounts Reports to show for this period.

Custom Checklists

There are no archived checklists to display for this period.

Cybersecurity - Vendor Due Diligence

Subscribed Vendor Document Reviews
There are no reviewed subscribed vendor documents to show for this period.

Other Vendor Document Reviews
There are no reviewed other vendor documents to show for this period.

Cybersecurity - Employee & Systems Inventory Confirmations

Cyber Employees Confirmation
There are no cyber employee confirmations for this period.

Technology NPI/Users Confirmation

There are no vendor user confirmations for this period.

Vendor Access Removals

There are no vendor access removal confirmations for this period.

Vendor Removals

There are no vendor removals for this period.

Cybersecurity - Device Inventory

Device Submissions

There are no device submissions for this period.

Periodic Device Reviews

There are no periodic device reviews for this period.

Device Removals

There are no device removals for this period.

Cybersecurity - Email Phishing Testing

There are no email phishing testing campaigns to show for this period.

Certificate Of Completion

Envelope Id: 0D890348F0E34EB5BB49799FB908EFA4	Status: Completed
Subject: Complete with DocuSign: Triton's Written Privacy Policy Re 08:10:2023.pdf	
Source Envelope:	
Document Pages: 8	Signatures: 1
Certificate Pages: 1	Initials: 0
AutoNav: Disabled	Envelope Originator:
Envelope Stamping: Disabled	Charles Coleman
Time Zone: (UTC-06:00) Central Time (US & Canada)	200 S 108th Ave
	Omaha, NE 68154-2631
	charlescoleman@TritonInvestments.net
	IP Address: 69.84.71.190

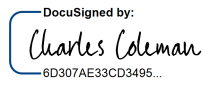
Record Tracking

Status: Original	Holder: Charles Coleman	Location: DocuSign
8/10/2023 4:16:04 PM	charlescoleman@TritonInvestments.net	

Signer Events

Charles Coleman
charlescoleman@TritonInvestments.net
Managing Partner
Triton Investments, LLC
Security Level: Email, Account Authentication (None)

Signature

DocuSigned by:

6D307AE33CD3495...
Signature Adoption: Pre-selected Style
Using IP Address: 69.84.71.190

Timestamp

Sent: 8/10/2023 4:16:20 PM
Viewed: 8/10/2023 4:16:44 PM
Signed: 8/10/2023 4:17:02 PM
Freeform Signing

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	8/10/2023 4:16:20 PM
Certified Delivered	Security Checked	8/10/2023 4:16:44 PM
Signing Complete	Security Checked	8/10/2023 4:17:02 PM
Completed	Security Checked	8/10/2023 4:17:02 PM
Payment Events	Status	Timestamps