



ANDORRA CAPITAL, LLC

January 2025

PRIVACY POLICY

To Our Valued Investors & Clients:

This notice is provided to meet the financial privacy requirements under the Gramm-Leach-Bliley Act (GLBA) as adopted by the State of Nebraska. Protecting your privacy and maintaining your trust are priorities for Andorra Capital, LLC.

1. Commitment to Privacy

Andorra Capital, LLC is committed to maintaining the confidentiality of our investors' and clients' information. Safeguarding this information is a high priority.

2. Information We Collect

We collect personal information that is necessary to provide our services, communicate with you, and comply with legal obligations. The types of information we may collect include:

- **Personal Identification Information:** Name, address, email, phone number, date of birth, social security number (if applicable), and other identifying information.
- **Financial Information:** Investment preferences, account details, financial status, risk tolerance, and transaction history.

3. How We Use Your Information

We use the information we collect for the following purposes:

- **To Provide Services:** To manage your investment accounts, provide financial advice, and fulfill contractual obligations.
- **Communication:** To send you updates, newsletters, marketing materials, and important information related to your accounts or services.
- **Compliance with Laws and Regulations:** To comply with legal obligations, including KYC (Know Your Customer) and anti-money laundering (AML) regulations.
- **Improvement of Services:** To analyze and improve our services, website, and client experience.

4. Information Sharing

No investor or client information is shared with third parties for solicitation purposes.

5. Parties with Access to Your Information

During the course of normal business operations, we may share investor and client information with the following parties:

- **Charles Schwab:** Investor accounts are maintained with Charles Schwab, and information may be shared with them for account administration and management purposes.
- **Gryphon Fund Group:** For investors in our fund, certain information is shared with Gryphon Fund Group, our third-party fund administrator. Gryphon Fund Group uses this information solely to perform fund administration services, such as maintaining investor records, processing subscriptions and redemptions, and preparing account statements.
- **Government Agencies:** Client information may be reviewed by regulatory bodies during routine state investment advisor examinations or as required by law.
- **CPA Firm:** A CPA firm engaged by Andorra Capital, LLC to audit our books and records may have access to limited investor/client information.

All third parties mentioned adhere to strict confidentiality guidelines and can only use client data for the purpose of conducting their normal business operations.

6. Disclosure to Nonaffiliated Third Parties

Andorra Capital, LLC does not disclose investor or client information to nonaffiliated third parties except in the following cases:

- When specific requests are made by an investor or client, such as for tax preparation, legal representation, or loan applications.
- With prior written consent from the investor or client for other purposes as outlined.

7. Opt-Out Provision

As outlined in Regulation S-P, since no investor or client information is disclosed to third parties except as described above, all investors and clients are considered to have "opted out" of further information disclosure.

8. Data Security and Access

We take reasonable steps to protect your personal information from unauthorized access, use, or disclosure. This includes using physical locks, encryption, firewalls, and other safeguards to protect your data. However, no method physical security, transmission over the internet, or electronic storage is completely secure, and we cannot guarantee absolute security.

- **Hardcopy Materials:** All hardcopy materials containing investor and client information are securely stored in locked file cabinets located at our main office, branch offices, and/or the offices of Investment Adviser Representatives (IARs). Only authorized personnel, including the principals of Andorra Capital, LLC and your Investment Advisor Representative (IAR), have access to your files.
- **Electronic Files:** We may securely back up hardcopy files electronically and share these files securely between office locations. Outdated or redundant documents are properly destroyed before disposal.
- **Network Security:** We use secure local area computer networks, protected by firewalls, to access the internet. Our IT infrastructure is physically located on-site, and IT personnel do not have access to our computers. To protect against viruses and other cyber threats, we monitor and protect our systems with commercially available antivirus software and private cyber-defense services.
- **File Storage:** Files may be securely stored and shared via Microsoft Office 365, with redundant backups maintained through a third-party encryption service.

9. Form ADV Part II

In compliance with state regulations, we update Form ADV Part II annually, during the first quarter, and as needed throughout the year to reflect any changes in our business operations. A copy of Form ADV Part II is available upon request.

10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will post the revised policy on our website and update the "Effective Date" at the top of this page. We encourage you to review this Privacy Policy periodically for any changes.

11. Contact Information

If you have any questions or concerns regarding this Privacy Policy, Form ADV Part II, or Regulation S-P, please contact us at: (402) 434-2412