



The Abernathy Group II
Family Office

ABERNATHY GROUP II LLC
PRIVACY NOTICE
February 2022

Abernathy Group II LLC (referred to as “Abernathy”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, Abernathy attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

PROTECTING INFORMATION ABOUT YOU FROM MARKETERS.

TAG II does not sell or otherwise share any personally identifiable information about the customers, including former customers, of its introducing broker ("Customer Information") with marketers.

MAKING THE SECURITY OF INFORMATION A PRIORITY.

It is the policy of Abernathy to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of Abernathy. In that regard, Abernathy may disclose the client’s information: (1) to individuals and/or entities not affiliated with Abernathy, including, but not limited to the client’s other professional advisors and/or certain service providers that may be recommended or engaged by Abernathy in furtherance of the client's engagement of Abernathy (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in

accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by Abernathy to facilitate the commencement/continuation/termination of a business relationship between the client and/or between Abernathy and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of Abernathy (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

COLLECTING INFORMATION.

We collect and use various types of information to service your accounts, save you time and money and better understand your needs.

Customer Information we collect is defined as the following five types:

1-Information you provide to us on applications and through other means, such as your assets, income, and debts.

2-Information about your transactions and account experience with us or our family of companies, such as your account balance or transaction history; or information about any communication between us.

3-Information from a consumer report, such as information regarding your credit-worthiness or credit history.

4-Information from other outside sources regarding their employment, credit or other relationship with you or verifying representations made by you, such as your employment history or loan or credit card balances.

5-Other general information we obtain about you that is not assembled for the purposes of determining your eligibility for any product or service, such as demographic information.

SHARING INFORMATION WITH COMPANIES THAT WORK FOR US.

If you are a new client, we may begin sharing the information on the day you sign our advisory agreement. When you are no longer a client, we may continue to share your information as described in this notice.

We may share all five types of Customer Information with companies that work for us, including affiliates, to provide you products and services that you've requested or already have with us. We share the information needed to provide those products and services and to provide a good customer experience. These companies may include financial service providers such as insurance companies and payment processing companies, and nonfinancial companies such as check printing and data processing companies. These companies might assist us, for example, in fulfilling your service request, processing your transaction, or mailing account statements. All of these companies act on our behalf, are

contractually obligated to keep the information that we provide to them confidential, and use the information only to provide the services we've asked them to perform for you and us.

Abernathy permits authorized employees and to have access to client information. Employees violating Abernathy's Privacy Policy will be subject to Abernathy's disciplinary process.

DISCLOSING INFORMATION IN OTHER SITUATIONS.

We may also disclose any of the five types of Customer Information to credit bureaus and similar organizations, and otherwise when permitted by law. For example, this may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, an audit or examination, or the sale of your account to another financial institution. Through the normal course of doing business, including servicing your accounts and better serving your financial needs, we will continue to share transaction and account experience information, as well as other general information among our family of companies. We may also share any of the five types of Customer Information outside of our family of companies if we have your consent.

KEEPING UP-TO-DATE WITH OUR PRIVACY POLICY.

Abernathy will provide notice of our privacy policy annually.

Should you have any questions regarding the above, please contact Edward Coyle, Chief Compliance Officer at 212 293-3410 or ecoyle@abbygroup.com