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Cresta Advisors, Ltd.

Privacy Policy

CRESTA ADVISORS

Privacy Policy

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1. Introduction

An important part of the relationship we have with our clients is the information you share with us. Protecting your privacy is important to us and we want you to know how we treat your nonpublic personal information.

Pursuant to Title V of the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission ("SEC") Regulation S-P (17 CFR 248.1 – 248.30), this document explains the Privacy Policy of Cresta Advisors, Ltd. ("Cresta Advisors") concerning the privacy interests of our clients. Cresta Advisors is a limited company with its office in Laredo, Texas. Cresta Advisors is an investment adviser registered with the SEC. Cresta Advisors' principal business is to act as an investment adviser in accordance with all laws, rules and regulations applicable to investment advisers and the business conducted by investment advisers. As an investment adviser, Cresta Advisors' principal business is to provide investment advisory and investment management services to clients.

The policy of Cresta Advisors is to protect the confidentiality, integrity and security of any nonpublic personal information of its clients and prospective clients, and to prevent unauthorized access to, or the use or disclosure of such information. In its capacity as an investment adviser, investment manager, and in conducting its advisory business, Cresta Advisors receives and/or comes into contact with certain nonpublic personal information concerning its current and/or former customers. Cresta Advisors receives and/or comes into contact with the nonpublic personal information only for purposes of conducting its business as described above. Any and all such nonpublic personal information is hereinafter referred to as "nonpublic personal information." For convenience, "you" or "your" refers to any and all client(s) described above and "we," "our" and "us" refers to Cresta Advisors throughout this document.

2. Our Commitment to You

We are committed to safeguarding the use of your nonpublic personal information. We protect the security and confidentiality of the nonpublic personal information we have collected, and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your nonpublic personal information, and we do everything we can to maintain that trust.

We do not sell your nonpublic personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes, in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your nonpublic personal information is collected and used are set forth in this Privacy Policy.

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3. Definitions

- Affiliates
    - Companies related by common ownership or control. They can be financial and non-financial companies. We do not share your nonpublic personal information with any affiliates.
- Non-Affiliates
    - Companies not related by common ownership or control. They can be financial and non-financial companies. We do not share your nonpublic personal information with non-affiliates except as describe in this notice.
- Joint Marketing
    - A formal agreement between non-affiliated financial companies that together market financial products or services to you. We do not engage in joint marketing.
- Vulnerable Adult
    - a person 65 years of age or older; or
    - a person with a mental, physical, or intellectual or developmental disability that substantially impairs the person's ability to provide adequately for the person's care or protection and who is 18 years of age or older.

4. Nonpublic Personal Information Collected

In conducting business as described above, Cresta Advisors collects (or may collect), for example, the following types of nonpublic personal information:

- Information we receive from you such as:
    - Information you provide in connection with any securities account, margin loan, debit card or any other financial product or service, such as your name, address, social security number, tax ID number, assets, income, investment objectives, financial situation and debt. This information is obtained (or may be obtained) in writing, in person, by telephone, electronically or by any other means.
    - Information we obtain (or may obtain) for the purpose of tax reporting to you and to the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (“IRS”) forms.
- Information about your securities and/or other transactions such as:
    - Information we collect that relates to account balance, payment history, trading activity and any other transactions concerning which we provide investment advisory services or investment management services
    - Information we collect as part of servicing your account(s).
- Information about your transactions with non-affiliated third parties such as:
    - Information from non-affiliated third parties pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including information and/or documents received, shared, produced or provided in connection with a subpoena, discovery request or other legal process compelling production

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- Information from non-affiliated third parties related to servicing your account for purposes of providing investment management services.

5. Nonpublic Personal Information Disclosed to Affiliates and Non-affiliated Third Parties

We disclose to affiliates and non-affiliated third parties nonpublic personal information only in connection with us providing investment management services or in respect of conducting our investment advisory business. Such disclosures include, among other things, information related to transactions, settlement, billing, payment, processing, clearing, transferring, reconciling, collection and tax reporting. Such disclosures may be provided to affiliates and non-affiliated third parties:

- As required or necessary to carry out fully and properly the business conducted by us such as:
  - Disclosures to affiliated and non-affiliated third-party service providers who supply us with computer related services including data maintenance and document processing and delivery
  - Processing services, and disclosures to non-affiliated third parties such as securities clearing agencies and entities
- As required by law or legal process
- As required for senior/vulnerable individuals
- With your consent.

6. Former Customers

We will disclose nonpublic personal information about former clients of our investment advisory and investment management business only as permitted and/or required by law or legal process, or with the former client's consent.

7. When You Can Limit Sharing

Federal law gives you the right to limit the sharing of your nonpublic personal information, when: (1) sharing is for affiliates' everyday business purposes, (2) sharing with affiliates is done to use your information to market to you, and (3) sharing with non-affiliates is done to use your information to market to you. We do not share your information in any of these ways. State laws and individual companies may give you additional rights to limit sharing.

8. Confidentiality and Security of Nonpublic Personal Information

We are committed to implementing and maintaining commercially reasonable and appropriate measures to maintain your nonpublic personal information in a secure and confidential fashion. Our information security procedures include, but are not limited to, the following features:

- Access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals, and controls to prevent our employees from providing nonpublic personal information to unauthorized individuals who may seek to obtain this information through fraudulent means

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- Physical access restrictions at locations such as buildings, computer facilities, and record storage facilities, in order to restrict access of nonpublic personal information to unauthorized individuals
- Segregation of duties for our employees with responsibilities necessitating access to nonpublic personal information
- Response programs that specify actions to be taken when we suspect or detect that unauthorized individuals may have gained access to nonpublic personal information
- A disaster recovery plan to protect against loss or damage to nonpublic personal information due to potential hazards, such as fire and water damage or technological interruption or failure.

We regularly review, revise and update our information security procedures to account for changes in technology.

9. Maintenance of Records

Nonpublic personal information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

10. Notice to Clients

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy, and we will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

11. Opting Out

Section 502(a) of the G-L-B Act generally prohibits a financial institution, directly or through its affiliates, from sharing nonpublic personal information with a non-affiliated third party unless the institution (i) provides the consumer with a notice of the institution's privacy policies and practices, (ii) provides the consumer with a clear and conspicuous notice that the consumer's nonpublic personal information may be disclosed to non-affiliated third parties, (iii) gives the consumer an opportunity to opt out of that disclosure, and (iv) informs the consumer how to opt out.

Clients cannot opt out of allowing Cresta Advisors, Ltd. to share their nonpublic personal information with non-affiliated third parties which are necessary to service their accounts such as Custodians, Third Party Administrators or certain software vendors. We do not share client information with any third parties that do not need the information in order to provide some type of service for your account.

12. Requests for Information

Anyone may request a copy of our Privacy Policy or procedures by contacting the office either in writing at 2019 E Del Mar Blvd, Suite 100, Laredo, TX 78041, or by phone at (956) 267-8130.

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