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MOUNT VERNON
CAPITAL ADVISORS LLC

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Information Security and Confidentiality Statement

1. Policy Statement

Mount Vernon Capital Advisors LLC ("MVCA") considers the protection of confidential information and personally identifiable information (collectively, "sensitive information") to be essential for building trust with its clients and partners. We are committed to providing administrative, technical, and physical safeguards for protecting sensitive information. MVCA's information security controls are designed to:

- Ensure the security and confidentiality of sensitive information.
- Protect against any anticipated threats or hazards to the security or integrity of sensitive information.
- Protect against unauthorized access to or use of sensitive Information that could result in substantial harm or inconvenience.

2. Security Controls

2.1. Transmission

Transmission, sending and receipt of sensitive information are performed through secure protocols including encryption of the information during the transmission process.

2.1.1 Electronic Mail

- MVCA uses ProtonMail (https://protonmail.com/security-details) a Swiss-based company, as the primary means of electronic mail communication.
- ProtonMail uses secure implementations of AES, RSA, and OpenPGP. These systems use end-to-end encryption to ensure only the intended recipient can read the message.
- All data are protected by the Swiss Federal Data Protection Act (DPA) and the Swiss Federal Data Protection Ordinance (DPO).
- No metadata such as IP addresses are recorded on either end of the encryption.
- All emails are kept in a secure datacenter located under 1,000 meters of granite rock in a heavily guarded bunker.

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2.2. Storage

All information classified as sensitive information will be encrypted in storage to safeguard the information and ensure its confidentiality.

2.2.1 Storage of electronic data

- MVCA uses Sync.com (https://www.sync.com/features/), a Canadian-based company, for its storage of sensitive information data.
- Storage is secured with 2048 bit RSA, 256 bit AES, SSL, and TLS encryption.
- All files are stored in SOC-1 certified datacenters with security audits by KPMG.
- No metadata such as IP Addresses are recorded.
- MVCA shares files with clients using secure links with key stretched passwords using PBKDF2 with a high iteration count to generate the encryption key used to unlock the link.
- SSL is applied as an extra layer on tops of the 2048 bit RSA and 256 AES encryptions used to encrypt each file.

2.3. Access

MVCA restricts electronic and physical access to sensitive information to those who require it to develop, support, offer and deliver products and services to its clients.

2.4. Disposal

All information classified as sensitive information will be destroyed once it is no longer required to be retained by MVCA per the terms of the client engagement letter. The disposition or destruction of the data will adhere to information security disposal best practices to ensure that the data are properly destroyed and confidentiality is maintained.

2.5. Use

MVCA uses sensitive information to develop, support, offer and deliver products and services to its clients. We only share sensitive information with other individuals or organizations (e.g. outside counsel, investment bankers, financial advisors, etc.) if mutually agreed to by our client, unless we are otherwise permitted or required to by law.