

## Privacy Policy

*Effective March 2017*

Nicholas Investment Partners, LP (“Nicholas”) recognizes the importance of protecting client’s personal information and has established policies related to collecting, storing, protecting and sharing client information. Your privacy and confidentiality are a top priority and fundamental to our relationship.

### **Information we may collect**

When establishing client relationships and servicing client accounts, Nicholas collects various non-public personal information (“Personal Information”). You may provide Personal Information electronically, in writing or verbally in account opening documents, agreements or third-party contracts. Nicholas may also collect Personal Information from users of its website where visitors submit information to subscribe to various services on our site. The types of Personal Information collected may include your name and address, e-mail address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, and accounts at other institutions. On occasion, such information may come from those providing services to us or our clients.

Former client’s Personal Information is treated with the same care and protection as our current clients.

### **How we use your Personal Information**

We may use your Personal Information for various reasons, including to:

- Open, service and maintain your account
- Process your transactions
- Respond to inquiries and requests
- Offer or deliver information for products and services
- Fulfill legal and regulatory requirements

We do not sell Personal Information about current or former clients to any third parties. We do not disclose it to third parties unless it is necessary to service the account, process transactions or comply with applicable laws and regulations.

E-mail addresses collected on this site will be treated as Personal Information. If we send you an email with information on additional products and services that may be of interest to you, the email will include instructions and links for unsubscribing from these types of mailings in the future. If you do not want us to use your email address to provide additional information about our services, please e-mail us at [info@nicpartners.com](mailto:info@nicpartners.com).

### **How we Secure your Information**

We maintain physical, electronic and procedural safeguards to protect your Personal Information. Nicholas limits access to Personal Information to those who need it to perform their jobs, such as servicing your accounts, processing transactions or informing you of new products or services. Our Code of Ethics, which applies to all employees, restricts the use of client information and requires employees to treat Personal Information with strict confidence.

For more information about our security measures, technologies and policies, please e-mail us at [info@nicpartners.com](mailto:info@nicpartners.com).

Our site is intended for a U.S. audience.