

Stonebridge Capital Advisors, LLC

Privacy Commitment

We recognize that protecting the privacy and security of the confidential personal information we collect about you is of fundamental importance. The following information will help you understand how we handle and maintain confidential personal information as we fulfill our obligation to protect your privacy. "Personal information" refers to the information we collect directly from you in connection with providing you with investment management services.

Information We Collect

We collect personal information to help us serve your financial needs, provide better customer service and fulfill legal and regulatory requirements. The type of information that we collect varies according to the services involved, and may include:

- Information we receive from you on applications and related forms: name, address, social security number, employment information, assets and income, investment objectives and experience, financial circumstances.
- Information about your transactions with us and your custodian: related investment portfolios, account balance and transactions, and securities transactions.
- Information we receive from third parties in order to serve you: outside portfolios, securities transactions, and other financial information from previous investment managers or plans.

Information Disclosed in Administering Products and Services

We will not disclose personal information about current or former clients to non-affiliated third parties, except as may be authorized by you, the client. We do not sell any personal information about you to anyone. In the normal course of business, personal information may be shared with persons or entities involved in servicing and administering products and services on our behalf, including: your financial consultant, advisor or broker, your custodian, and/or broker dealers with whom we trade securities.

Procedures to Protect Confidentiality and Security of Your Personal Information

We have procedures in place that we believe are reasonably designed to internally safeguard your nonpublic personal information. These include restricting access of such information to only those employees who provide products or services to you or those who need access to your information to service your account. In addition, we maintain physical, electronic, and procedural safeguards that meet federal and/or state standards to guard your personal information. These include password-protected user access to our computer files, strict confidentiality policies that apply to all employees, and ongoing training.

We update our policy and procedures where necessary to ensure that your privacy is maintained and that we conduct our business in a way that fulfills our commitment to you. If we make any material changes in our privacy policy, we will notify you of such changes immediately.