DEVIL MOUNTAIN INVESTMENT MANAGEMENT

Privacy Notice

How Devil Mountain Investment Management Protects Your Personal Information

Our Commitment to Privacy

Devil Mountain Investment Management is committed to protecting the confidentiality and security of the personal information entrusted to us. This notice explains the information we collect, how we use it, when it may be shared, and the safeguards we maintain. These practices apply to both current and former clients.

Information We Collect

We collect only the information reasonably necessary to establish and service advisory relationships, manage accounts, communicate with clients, bill advisory fees, and satisfy legal and regulatory obligations. This information may include:

- Name, address, telephone number, email address, date of birth, Social Security or taxpayer identification number, and other identifying information;
- Financial information, including income, net worth, tax status, investment experience, investment objectives, risk tolerance, liquidity needs, and account information;
- Information about transactions, holdings, account balances, advisory fees, and communications relating to your accounts; and
- Information provided by you, Interactive Brokers, another custodian or financial institution, or an attorney, accountant, trustee, or other representative you authorize.

The Firm does not ordinarily obtain consumer credit reports or use client information to evaluate creditworthiness.

How We Use Your Information

We use personal information for legitimate business and regulatory purposes, including to:

- Provide investment advisory services and manage your portfolio;
- Open, maintain, monitor, and service accounts;
- Process transactions and respond to your instructions;
- Calculate and collect advisory fees;
- Maintain required books and records;
- Prevent fraud, protect accounts, and address information-security concerns; and
- Comply with applicable laws, regulations, examinations, subpoenas, court orders, or other legal requirements.

When Information May Be Disclosed

Devil Mountain Investment Management does not sell personal information and does not share client information with unaffiliated third parties for their independent marketing purposes. Information may be disclosed only as reasonably necessary in circumstances such as the following:

- To Interactive Brokers LLC, the Firm's primary independent custodian, and to other custodians, brokers, transfer agents, or financial institutions involved in servicing your account;
- To accountants, attorneys, compliance consultants, technology providers, recordkeeping providers, or other service providers that assist the Firm in operating its business;
- To your accountant, attorney, trustee, family member, or other representative when you authorize the disclosure;
- To regulators, law-enforcement agencies, courts, or other governmental authorities when required or permitted by law; or
- To protect against fraud, unauthorized transactions, claims, or other potential liability.

The Firm has no affiliated financial companies with which it shares client information for marketing purposes. Because the Firm does not make disclosures that require a client opt-out election, no opt-out form is included with this notice.

Interactive Brokers and Client Account Access

Client assets are held in accounts in each client's own name at Interactive Brokers LLC or another independent qualified custodian. The Firm accesses account information through its adviser platform only as necessary to provide advisory services. Clients maintain direct online access to their custodial accounts, statements, tax documents, holdings, transactions, and other account information. Interactive Brokers maintains its own privacy and information-security policies.

RightCapital Financial Planning Software

Devil Mountain Investment Management uses RightCapital, Inc., an independent financial planning software provider, to prepare and maintain client financial plans. The Firm may enter client financial, tax, insurance, retirement, and other planning information into RightCapital as necessary to provide these services. RightCapital maintains its own privacy, cybersecurity, and information-security controls, and the Firm relies on the protections and safeguards provided by RightCapital for information maintained on its platform. Access and use are limited to what is reasonably necessary to provide financial planning and advisory services.

How We Protect Information

The Firm maintains administrative, electronic, and physical safeguards reasonably designed to protect client information from unauthorized access or use. These safeguards include password-protected systems, multifactor authentication where available, device protections, restricted access to records, secure custodial systems, backups, and appropriate disposal of records.

Because the Firm is operated by one person, access to client information is generally limited to Chris Hannan and to service providers or professional advisers that require access for legitimate business, legal, compliance, or operational purposes. If personnel are added in the future, they will be subject to confidentiality and information-security requirements appropriate to their responsibilities.

Website Information

The Firm's website or hosting provider may collect limited technical information commonly collected by websites, such as browser type, IP address, and pages accessed. The Firm does not use website information to sell personal data or independently market third-party products.

Information-Security Incidents

If the Firm becomes aware of unauthorized access to client information, it will investigate the incident, take reasonable steps to contain and remediate it, coordinate with affected service providers, and provide notices to clients or governmental authorities when required by applicable law.

Access, Corrections, and Questions

Clients may contact the Firm to request correction of inaccurate contact, financial, or account information. The Firm will respond to access or correction requests as required by applicable law, subject to applicable legal, regulatory, confidentiality, and recordkeeping limitations.

Chris Hannan, Chief Compliance Officer | 11513 Shoreview Overlook, Austin, Texas | 925-389-0419 | chrishannan@devilmtn.com

Changes to This Notice

The Firm may revise this notice when its privacy practices or applicable legal requirements change. A revised notice will be provided when required, including when the Firm materially changes how it collects, uses, or shares nonpublic personal information.

Effective Date: July 2026