## **Privacy Policy Notice**

One of our firm's greatest assets has been the emphasis on maintaining complete privacy on information provided by our customers. Diamant Asset Management, Inc. is a registered investment advisor that uses this information to maintain client portfolios and provide investment advice. We treat the information we gather about you in a confidential manner.

We maintain physical, electronic and procedural safeguards that insure the safety of customer information. We restrict access to your personal and account information to those employees who need to know that information to provide services to you. This data may be non-public personal, financial information about you that we collect directly from you or from other sources. We collect information from our forms, including our application form and transactions with our firm or others. Such information may include personal information such as name and address, and financial information such as your income and assets.

It is our policy not to disclose any nonpublic personal information about you to anyone not described in this notice, except as permitted by law. Further, we do not share any personal information with other companies for marketing purposes. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

## **BCP** Disclosure Statement

Diamant Asset Management Inc. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption, you cannot contact us as you usually do at 203-661-6410, you should go to our web site at <a href="https://www.portfolioadvisor.com">www.portfolioadvisor.com</a>. After restoring communication after a significant business disruption event, we will be available to handle the usual and customary investment advisory client services.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and

counter-party impact; regulatory reporting; and assuring our customers continuing access to their funds and securities through the ongoing use of a third party custodian in the event we are unable to continue our business.

We back up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, our objective is to restore operations and be able to complete existing transactions and accept new transactions and payments within the same business day. Your communications with us could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within the same business day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within two business days. In either situation, we plan to continue in business, and notify you how to contact us through our web site <a href="www.portfolioadvisor.com">www.portfolioadvisor.com</a>. If the significant business disruption is so severe that it prevents us from remaining in business, the ongoing use of a third-party custodian will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at 203-661-6410 or at herb@portfolioadvisor.com.