Privacy Policy

Effective: March 27, 2026

Our Commitment to You

Santa Barbara Mgmt, LLC (“SBM” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. SBM (also referred to as "we", "our" and "us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

We may share non-public personal information with service providers as necessary to perform services for you, but we do not sell your non-public personal information and we do not share it with third parties for their own marketing purposes.

SBM does not sell your non-public personal information to anyone, nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?
Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number and/or Passport Number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals
Communications with us, including emails, meeting notes, and (if applicable) recorded or transcribed meeting content	Information you provide during meetings, calls, or through online portals

How do we protect your information?
To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information. Despite our safeguards, no method of transmission or storage is 100% secure. We continually evaluate and enhance our security controls to reduce risk.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we use technology tools?
We may use third-party technology tools for administrative, communication, and recordkeeping purposes, including tools that may assist with meeting scheduling, transcription, note-taking, or summarization. When used, information from meetings or communications (including audio, written notes, or related materials) may be processed by our service providers. These tools are not used to make investment decisions or place trades. We seek to limit the information shared, apply access controls, and retain information consistent with our confidentiality and recordkeeping obligations. You will be notified when an online meeting is being recorded or transcribed and may request that the feature not be used.

How do we share your information?
An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, technology service providers, cloud hosting providers, recordkeeping vendors, regulators, credit agencies, and other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes SBM does not disclose non-public personal information to non-affiliated third parties for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and to persons or entities that we reasonably believe are your authorized agents or representatives, including family members, trustees, attorneys, accountants, and personnel of client-affiliated family office entities, as applicable.	Yes	Yes
Information About Former Clients Santa Barbara does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared
SMS Communication Santa Barbara does not disclose, and does not intend to disclose mobile opt-in or text message consent with third parties or affiliates.	No	Not Shared

Recordkeeping. We retain certain records relating to our clients and former clients as required by applicable law and regulation, including the Investment Advisers Act of 1940 and related SEC rules.

Changes to our Privacy Policy
We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?
You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (734) 604-9891.

SMS Terms and Conditions

SMS Consent Communication:

The information (Phone Numbers) obtained as part of the SMS consent process will not be shared with third parties for marketing purposes.

Types of SMS Communications:

If you have consented to receive text messages from Santa Barbara, you may receive messages related to the following:

- Reminders
- Follow-up messages
- Responses to inquiries

Message Frequency:

Message frequency may vary depending on the type of communication and the necessary follow-up to respond to a client inquiry.

Potential Fees for SMS Messaging:

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

Opt-In Method:

You may opt-in to receive SMS messages from Santa Barbara in the following ways

- Verbally, during a conversation. Santa Barbara Management gets consent verbally by asking "Do you agree to receive conversational (external) text messages from Santa Barbara Management? Messaging frequency may vary. You can view our Privacy Policy and Terms of Service at our website, sbmanagement.com."

Opt-Out Method:

You can opt out of receiving SMS messages at any time. To do so, simply reply "STOP" to any SMS message you receive. Alternatively, you can contact us directly to request removal from our messaging list.

Help:

If you are experiencing any issues, you can reply with the keyword HELP or visit our Privacy Policy and Terms of Service pages at https://www.santabarbaramanagement.com/.

Standard Messaging Disclosures:

- Message and data rates may apply.
- You can opt out at any time by texting "STOP."
- For assistance, text "HELP" or visit our [Privacy Policy] and [Terms and Conditions] pages.
- Message frequency may vary