Bellingham
CAPITAL MANAGEMENT, INC

316 East McLeod Road, Suite 105
Bellingham, WA 98226
(360)685-4240

Bellingham Capital Management, Inc.

Privacy Policy and Procedures

Effective March 30, 2026

This policy is the property of Bellingham Capital Management, Inc. and its contents are confidential.

Bellingham Capital Management, Inc.
CRD Number 151684

Bellingham Capital does not have a financial interest in any of the recommended investments, nor receives compensation for recommending certain investments. These recommendations are specific to this analysis, and should not be construed as a recommendation in any other circumstance. Other investments may be equally as appropriate. This recommendation does not imply that the performance has been or will be better than other investments. These investments are NOT insured by a government agency or company, and may lose value.

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Introduction

Bellingham Capital Management, Inc., an investment advisory firm, is committed to safeguarding the confidential information of its clients. We do collect nonpublic personal information to provide you with accurate and pertinent financial advice. We hold all nonpublic personal information you provide to us in the strictest confidence.

These procedures are designed to:

1. Ensure the security and confidentiality of client information;

2. Protect against any anticipated threats or hazards to the security or integrity of client records and other client information; and

3. Protect against unauthorized access to, or use of, client information that could result in substantial harm or inconvenience to any client.

Bellingham Capital's Compliance Officer will have the overall responsibility for the Privacy Policy and Procedures and compliance with such. The Compliance Officer will implement, or cause to be implemented, the security measures described in this document.

What we collect

You may direct us not to make disclosures (other than disclosures required by law) regarding nonpublic personal information to nonaffiliated third parties. If you wish to opt out of disclosures to non-affiliated third parties, please contact us at (360) 685-4240.

Bellingham Capital Management, Inc. collects personal information about you from the following sources:

- Account applications or other forms
- Discussions with nonaffiliated third parties
- Information about your transactions with us or others
- Questionnaires
- Tax Returns
- Estate Planning Documents
- Insurance Policies

How we protect your personal information

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- We do not sell your personal information to anyone.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)

- We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt out of such disclosure.

- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.

- For nonaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.

- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information may be destroyed.

- We use a combination of administrative, preventative, and detective controls to assure that our hardware and client data is secured against cyber attacks as described in our Cybersecurity Policy.

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