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## 2026 Annual Notices

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### PRIVACY NOTICE

Argent Capital Management, LLC is committed to maintaining the confidentiality and security of the personal information collected from our potential, current and former clients. The proper handling of personal information is one of our highest priorities, and we feel it is important for you to understand the measures taken to protect your privacy. The following outlines how we use information collected from you and the measures taken to safeguard that information. It is our policy that we will never sell your information to any outside parties. We are committed to maintaining the confidentiality, integrity and security of each client's personal information and will handle personal client information and customer information in accordance with Regulation S-P (Privacy of Consumer Financial Information and Safeguarding Personal Information) and any other applicable laws, rules, and regulations.

#### Your Information

We collect and keep only information that is necessary for us to provide services as requested by you and to administer your business with us. The following nonpublic personal information may be collected:

- Information we receive from you on investment advisory agreements, client information forms and written or electronic correspondences – including, but not limited to, your name, address, phone number, tax ID number, assets, income, and date of birth; and
- Custodian account statements, which may include transactions with independent broker/dealers – including account numbers, account balances, cost basis information, and similar records.

#### Disclosures of Your Information

We will not disclose any nonpublic personal information about you to anyone unless it is necessary to implement your transactions with us, at your direction or required by law. If you decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice.

#### Sharing Your Information

We may use information collected from you to administer your accounts, funds, and records. For example, we and our service providers may use the information collected to evaluate your financial needs, administer your instructions or to comply with U.S. Securities and Exchange Commission laws and regulations. Such service providers have a legitimate business need to see your personal information for us to provide our services to you. We require these providers to strictly maintain the confidentiality of your information and to abide by all applicable laws. As permitted by law, we may disclose non-public personal information about you to:

- Companies with whom you enter into an agreement to provide financial advice and planning;
- Non-affiliated third-parties, such as outside providers that perform services for us including, but not limited to, recordkeeping, custodial administration and proxy voting services; and
- Good faith disclosures to regulators with regulatory authority over Argent.

#### Safeguarding Your Information

Your personal account information is restricted to those employees who need access to such information to provide investment advisory services to you. Argent also maintains physical, electronic, and procedural safeguards to protect your personal financial information. If Argent shares your information with a third-party service provider, we direct each provider to adhere to our privacy policy.

## Annual Notices

We provide our Privacy Notice to each client at least once per year, as federal and state laws require. We reserve the right to modify this policy at any time. If you have additional questions regarding Argent's Privacy Notice, questions regarding other written disclosures, or would like to request a copy of our ADV II (Disclosure Brochure), please contact:

Suzanne Hammer, Chief Compliance Officer  
Argent Capital Management, LLC  
100 South Brentwood Blvd., Suite 110  
Clayton, MO 63105  
Telephone: (314) 725-6000  
Email: [shammer@argentcapital.com](mailto:shammer@argentcapital.com)

## PRIVACY NOTICE - EU Supplement

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This Privacy Notice explains how our organization uses the personal data we collect from you when you use our website.

### Topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Marketing
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

### What Data Do We Collect?

We collect and keep only information that is necessary for us to provide services as requested by you and to administer your business with us. The following nonpublic personal information may be collected: Information we receive from you on investment advisory agreements, client information forms, and written or electronic correspondence including, but not limited to, your name, address, phone number, tax ID number, assets, income and date of birth; and custodian account statements, that may include transactions with independent broker/dealers – including account numbers, account balances, cost basis information and similar records.

## How Do We Collect Your Data?

You provide Argent directly with most of the data we collect. We collect data and process data when you:

- Complete our investment advisory agreements and client information forms, and when providing written or electronic correspondence. Such data may include but is not limited to your name, address, phone number, tax ID number, assets, income, and date of birth; and
- Open an Argent investment account with your Custodial Bank, which provides Argent with account statements that may include transactions with independent broker/dealers – including account numbers, account balances, cost basis information, and similar records.
- Use or view our website via your browser's cookies.

## How Will We Use Your Data?

Argent collects your data so that we can

- Manage your account.
- Provide you with Argent's proprietary research, market commentary, and/or other information relating to our business relationship with you.
- Contact you with special offers on other products and services we think you might like.

We will never sell your information to any outside parties.

## How Do We Store Your Data?

Access to your personal account information is restricted to those employees who need such information to provide investment advisory services to you. Argent also maintains physical, electronic, and procedural safeguards to protect your personal financial information. If Argent shares your information with a third-party service provider, we direct each provider to adhere to our privacy policy.

Our Company securely stores your data either at our office in Clayton, Missouri, USA, with electronic backups at undisclosed secure sites within the United States or through use of a third-party cloud-based software system, Software as a Service (SaaS) providers. These providers are included for areas such as, client relationship management (CRM) systems, portfolio reporting and analytic systems, financial accounting systems, secure file-sharing and document management tools, communication and conferencing tools, and cybersecurity and monitoring services. Vendors must meet security, confidentiality, and regulatory standards. We secure your data:

- by limiting physical access to our offices via electronic key card entry.
- by SaaS access controls.
- with multifactor password protection required to access all electronic files and systems.
- by implementation of various cyber security systems and programs along with continual cyber security employee training.

We retain your data as described herein only as long as necessary for the purposes outlined in this policy or as required by law.

## Marketing

Argent may send you information about other products and services of ours that we think you might like. You have the right at any time to stop Argent from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact:

Suzanne Hammer, Chief Compliance Officer  
Argent Capital Management, LLC  
100 South Brentwood Blvd., Suite 110  
Clayton, MO 63105  
Telephone: (314) 725-6000  
Email: [shammer@argentcapital.com](mailto:shammer@argentcapital.com)

## What Are Your Data Protection Rights?

Argent would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- The right to access - You have the right to request that Argent provide copies of your personal data. We may charge you a small fee for this service.
- The right to rectification - You have the right to request that Argent corrects any information you believe is inaccurate. You also have the right to request Argent to complete information you believe is incomplete.
- The right to erasure - You have the right to request that Argent erase your personal data, under certain conditions.
- The right to restrict processing - You have the right to request that Argent restrict the processing of your personal data, under certain conditions.
- The right to object to processing - You have the right to object to Argent's processing of your personal data, under certain conditions.
- The right to data portability - You have the right to request that Argent transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact:

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Clayton, MO 63105  
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Email: [shammer@argentcapital.com](mailto:shammer@argentcapital.com)

## What Are Cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. For further information, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## How Do We Use Cookies?

Argent uses cookies in connection with our marketing automation and website analytics provider. These cookies allow us to understand how visitors use our website, improve user experience, and deliver relevant content. Cookies are small text files placed on your device that store information such as whether you are a returning visitor, which pages are reviewed, and if you have previously submitted a form.

## What Types of Cookies Do We Use?

We use the following cookies provided by our marketing automation and website analytics provider:

- The main visitor tracking cookies, which records visits and session details. *(Expires after 6 months)*
- Used to keep track of a visitor's identity and is passed to our website analytics provider on form submission. *(Expires after 6 months)*
- Track sessions and determines whether to increase the session count. *(Expires after 30 minutes)*
- Determines if the visitor has restarted their browser. *(Expires at the end of session)*
- Used if you engage with our website chat to recognize your device and recall previous conversations. *(Expires after 6 months)*
- Consent Banner Cookies (opt-out, do\_not\_track, opt-in) – Remember your cookie preferences and whether you consent to tracking. *(Expire after 6–12 months, depending on the cookie)*

## How To Manage Cookies

You can set your browser not to accept cookies or to delete cookies that have already been set. The website [www.allaboutcookies.org](http://www.allaboutcookies.org) tells you how to remove cookies from your browser. Note that in a few cases, some of our website features may not function if settings are changed.

Where required by applicable law (e.g., GDPR, UK GDPR, ePrivacy), we will obtain your consent before placing non-essential cookies on your device.

## Privacy Policies of Other Websites

The Argent website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## Changes To Our Privacy Policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on November 26, 2025.

## How To Contact Us

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact:

Suzanne Hammer, Chief Compliance Officer  
Argent Capital Management, LLC  
100 South Brentwood Blvd., Suite 110  
Clayton, MO 63105  
Telephone: (314) 725-6000  
Email: [shammer@argentcapital.com](mailto:shammer@argentcapital.com)

## How To Contact the Appropriate Authority

Should you wish to report a complaint or if you believe that Argent has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office (UK residents) or the European Data Protection Supervisor (EU residents):

### United Kingdom:

Information Commissioner's Office Wycliffe House  
Water Lane Wilmslow Cheshire SK9 5AF  
Telephone: 0303 123 1113  
Fax: 01625 524510  
Website: <https://ico.org.uk/>

### European Union (EU):

European Data Protection Supervisor  
Postal address: Rue Wiertz 60, B-1047  
Brussels Office address: Rue Montoyer 30, B-1000  
Brussels Telephone: +32 2 283 19 00  
Email: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)  
Website: [https://edps.europa.eu/\\_en](https://edps.europa.eu/_en)

## BUSINESS CONTINUITY PLAN

Argent Capital Management, LLC maintains a *Business Continuity Plan*, which would guide our response to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, responding to actual events will require some flexibility. With that in mind, we provide you with this information regarding our *Business Continuity Plan*.

### Our Business Continuity Plan

After a significant business disruption, we plan to quickly recover and resume business operations by:

- Safeguarding our employees' lives, client assets and our property;
- Making timely and prudent financial and operational assessments;
- Protecting Argent's books and records; and
- Servicing the needs of our clients.

In short, our business continuity plan is designed to enable us to resume operations as quickly as possible following a significant business disruption.

Our business continuity plan addresses:

- Data back-up and recovery;
- Availability of mission critical systems;
- Financial and operational assessments;
- Alternative methods of communication with clients, employees and regulators;
- Critical supplier, custodian and third-party contractor impact;
- Alternate physical location for employees;
- Regulatory reporting; and
- Ensuring our clients receive prompt access to their funds and records.

### Varying Disruptions

Significant business disruptions can vary in scope and location – ranging from Argent's office to the building, business district, city or region in which we are located. Within each of these areas, the severity of the disruption can also range from minimal to severe. In a business disruption situation, we plan to continue business, transfer operations to our alternate site(s) and notify you by our website, phone recordings and phone calls.

### Annual Notices

Argent's *Business Continuity Plan* is subject to annual testing, review and update. If you have any questions relating to these matters, please do not hesitate to contact:

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Argent Capital Management, LLC  
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Clayton, MO 63105  
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Email: [shammer@argentcapital.com](mailto:shammer@argentcapital.com)

***Please inform us if you have any changes to your financial situation, investment objectives, specific account requests, or if you are not receiving statements (at least quarterly) from your account custodian.***