

## 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.

### 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.

### DISCLOSURE 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, carry out 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 in order 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 nonpublic 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 in order 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 our Chief Compliance Officer, Suzanne Hammer, at Argent Capital Management, LLC, 100 South Brentwood Blvd., Suite 110, Clayton, MO 63105 or at (314) 725-6000.

## **Privacy Notice (EU Supplement)**

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 believe 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. We will never sell your information to any outside parties.

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 your 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 at our offices in Clayton, Missouri, USA, with electronic backups at undisclosed secure sites within the United States. We secure your data:

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

### **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

### **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:

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

### **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 [allaboutcookies.org](http://allaboutcookies.org).

**How Do We Use Cookies?**

Argent does not use cookies.

**What Types Of Cookies Do We Use?**

Argent does not use cookies.

**How To Manage Cookies**

You can set your browser not to accept cookies, and the website [allaboutcookies.org](http://allaboutcookies.org) tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

**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 30, 2022.

**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)