Course Management
INVESTMENT ADVISORS

Course Management Investment Advisors, LLC

Our Commitment to Your Privacy

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Effective date: June 3, 2026

Your trust is the foundation of our work together, and protecting your privacy is part of how we honor it. Federal privacy law requires us to explain how we handle your nonpublic personal information. Our own professional standards of confidentiality are stricter than the law requires. This notice describes the information we collect, how we safeguard it, and the limited circumstances in which we may need to share it.

Information We Collect

Nonpublic personal information is information about you that is not publicly available and that we receive or develop in the course of serving you. It generally includes:

- Information you give us, on applications and forms, in conversations, or in documents you provide, such as your name, Social Security number, date of birth, contact details, financial account numbers and balances, banking information, and sources of income; and
- Information we develop while providing our services, such as the amount and type of assets we manage for you and the transactions we place on your behalf.

We also receive information from sources you authorize, such as your account custodian.

Our General Rule on Sharing

As a general rule, we do not disclose your nonpublic personal information to anyone outside our firm, and we never sell or rent it. We share it only when it is necessary to provide the services you have engaged us for, when you ask or authorize us to, or as otherwise permitted or required by law. The table below summarizes the reasons financial firms can share information, whether we share for that reason, and whether you can limit it.

Reasons we may share your information	Does CMIA share?	Can you limit this sharing?
For our everyday business purposes, such as servicing your accounts, processing transactions, responding to court orders, and complying with legal and regulatory requirements	**Yes**	No
To complete a transaction you have requested, such as placing trades or processing transfers with your custodian	**Yes**	No
For our own marketing, to offer you our services using information we already have	**Yes**	Yes
For joint marketing with other financial companies	**No**	Not applicable
With affiliates for their everyday business purposes	**No**	Not applicable
With affiliates or other companies so they can market to you	**No**	Not applicable
For the sale or rental of your information to anyone	**No, never**	Not applicable

The Service Providers We Rely On

To deliver our services, we work with a limited group of trusted providers who may need access to your information in the course of their work for us. Depending on the services you use, these may include our account custodian, Charles Schwab; the attorneys and accountants who advise our firm; and technology, recordkeeping, and administrative vendors. Where a provider is not already bound by a professional duty of confidentiality, as attorneys and accountants are, we require a written commitment that they will keep your information confidential and use it only for the services they provide to us.

Access Within Our Firm

We restrict access to your nonpublic personal information among our own personnel. Only those team members who need the information to help us serve you may access it.

How We Protect Your Information

We maintain physical, electronic, and procedural safeguards designed to protect your information, consistent with federal law. These include restricting access, securing our files and systems, and overseeing the providers who handle your information. We maintain a written information security program and have procedures to respond to and notify you of any unauthorized access to your sensitive information.

Former Clients and Recordkeeping

When you are no longer a client, we continue to protect your information under this same policy and limit our use of it to the purposes described here. We are required to retain certain records for at least five years, as our recordkeeping rules require. After the required retention period, we dispose of records containing your information in a secure manner.

Your Right to Limit Sharing

You can tell us at any time to stop using your information to market our services to you. To opt out, contact us by phone, mail, or email using the information below, and we will honor your request. Apart from our own marketing, we share your information only to serve you, to complete transactions you have requested, or as the law requires, so in those situations there is generally nothing to opt out of. If our practices ever change in a way that would let you limit other sharing, we will tell you and give you a clear and simple way to do so.

Changes to This Policy and How to Reach Us

We will provide this notice when you become a client. We are not required to send it to you every year, and we will not do so unless our privacy practices change. If we make a material change to this policy, we will provide you with an updated notice. If you have questions about our privacy practices, please contact:

Michael Bucceri, Chief Compliance Officer

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A Few Definitions

Nonpublic personal information: information about you that is not publicly available and that we collect in connection with providing financial services to you.

Affiliates: companies related to us by common ownership or control.

Nonaffiliates: companies that are not related to us by common ownership or control.

Joint marketing: a formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Course Management Investment Advisors, LLC is an SEC-registered investment adviser. Registration does not imply a certain level of skill or training.