

CLIENT DISCLOSURE DOCUMENT

Privacy Policy

Notice of Privacy Practices (Regulation S-P)

Baumont Capital LLC
d/b/a Baumont Capital Management

Address: 2021 North Ridgewood Drive, Wichita, KS 67208
Phone: (316) 204-6058
email: info@baumontcapital.com
Website: www.baumontcapital.com
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This Privacy Policy is provided to clients of Baumont Capital LLC d/b/a Baumont Capital Management pursuant to Regulation S-P (Privacy of Consumer Financial Information), adopted by the Securities and Exchange Commission under the Gramm-Leach-Bliley Act (GLBA). This notice is delivered to all clients at account opening and is available on Baumont Capital website. An updated notice will be provided annually and whenever material changes are made to this policy.

Privacy Notice Summary

The following table summarizes what Baumont Capital LLC does with your personal financial information:

What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: name, address, Social Security number, assets, income, account balances, investment experience, and transaction history.
How?	All financial companies need to share clients' personal financial information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal financial information; the reasons Baumont Capital LLC chooses to share; and whether you can limit this sharing.
What to do?	If you have questions, call (316) 204-6058 or email info@baumontcapital.com .

Information Sharing Practices

Reasons we can share your personal information	Does Baumont Capital share?	Can you limit this sharing?
For our everyday business purposes — such as processing your transactions, maintaining your account(s), or responding to court orders and legal investigations	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes — information about your transactions and experiences	No	N/A
For our affiliates' everyday business purposes — information about your creditworthiness	No	N/A
For nonaffiliates to market to you	No	N/A

Baumont Capital LLC does not sell client personal information to third parties. The Firm does not engage in joint marketing arrangements and has no affiliates that receive client information for marketing purposes.

Section 1 — Information We Collect

1.1 Categories of Information

Baumont Capital LLC collects nonpublic personal information about clients from the following sources:

- Information you provide directly: Name, address, phone number, email address, date of birth, Social Security number, employment information, financial goals, income, net worth, investment experience, and risk tolerance — collected during the account opening process and through the Investment Policy Statement (IPS);
- Information about your transactions: Account balances, transaction history, portfolio holdings, fee payment records, and trade confirmations — collected through your custodian and our advisory records;
- Information from third parties: Account information received from your custodian (e.g., Interactive Brokers, Fidelity, or Charles Schwab) as necessary to manage your account.

1.2 How We Use This Information

We use the information we collect to:

- Provide investment advisory services and manage your portfolio in accordance with your Investment Policy Statement;
- Communicate with you about your account, portfolio performance, and market conditions;
- Calculate and invoice advisory fees;
- Comply with applicable federal and state securities laws and regulatory requirements;
- Respond to inquiries from regulators, courts, or law enforcement as required by law.

Section 2 — Information We Share

2.1 Permitted Disclosures

Baumont Capital LLC may share your nonpublic personal information only in the following limited circumstances:

- With your custodian: We share information necessary to execute trades, manage your account, and facilitate fee billing with your chosen custodian (e.g., Interactive Brokers, Fidelity, or Charles Schwab). This is necessary to provide advisory services;
- As required by law: We may disclose information in response to a valid subpoena, court order, regulatory inquiry, or other legal process. We will notify you of such a disclosure to the extent permitted by law;
- With your consent: We may share information with third parties if you provide your express written consent;
- To protect against fraud: We may share information as necessary to protect against actual or potential fraud, unauthorized transactions, or other liability;

- In connection with a business transfer: If the Firm is sold, merged, or transferred to another registered investment adviser, client information may be transferred as part of that transaction, subject to applicable regulatory requirements and client consent.

2.2 Information We Do NOT Share

Baumont Capital LLC does not:

- Sell your personal information to any third party for any purpose;
- Share your information with non-affiliated third parties for their marketing purposes;
- Engage in joint marketing arrangements with other financial companies;
- Share your information with affiliates (the Firm has no affiliates);
- Share your Social Security number or other sensitive identifiers except as required to provide advisory services or comply with applicable law.

Section 3 — How We Protect Your Information

3.1 Physical Safeguards

The Firm maintains the following physical safeguards to protect client information:

- Client records stored in physical form are kept in a secure location with restricted access;
- Physical documents containing sensitive client information are shredded when no longer needed.

3.2 Electronic Safeguards

The Firm maintains the following electronic safeguards:

- All devices used for firm business are password-protected with strong, unique passwords;
- Two-factor authentication (2FA) is enabled on all critical accounts including IARD, custodian platforms, and email;
- Client records stored electronically are maintained in encrypted hard drive and/or cloud storage;
- Sensitive client data is never transmitted via unencrypted email;

3.3 Access Controls

Access to client information is strictly limited to:

- Rayan C. Hajjali, Managing Member and sole Investment Adviser Representative of Baumont Capital LLC;
- Third-party service providers (such as custodians) who require access to provide services to clients, subject to confidentiality obligations;
- Regulatory authorities as required by applicable law.

3.4 Data Breach Response

In the event of a data breach involving your nonpublic personal information, Baumont Capital LLC will:

- Take immediate steps to contain the breach and prevent further unauthorized access;
- Notify affected clients as promptly as possible and in accordance with applicable law;
- Notify the Kansas Office of the Securities Commissioner and any other required regulatory authorities;
- Take corrective measures to prevent future breaches.

Section 4 — Your Rights and Choices

4.1 Right to Access and Correct Your Information

As a client or a prospect, you have the right to request access to the personal information Baumont Capital LLC maintains about you. You also have the right to request deletion or correction of any incorrect information. To make such a request, please contact us at:

- Email: info@baumontcapital.com
- Phone: (316) 204-6058
- Mail: Baumont Capital LLC, 2021 North Ridgewood Drive, Wichita, KS 67208

4.2 Right to Opt-Out

Federal law gives you the right to limit some, but not all, sharing of your personal information. Baumont Capital LLC does not share your information with nonaffiliated third parties for marketing purposes, so there is currently no sharing that you need to opt-out of. If our sharing practices change in the future, we will provide you with an updated notice and an opportunity to opt-out before any new sharing begins.

4.3 Retention of Records

Baumont Capital LLC retains client records for a minimum of five (5) years following the termination of the advisory relationship, or longer if required by applicable law. Records are maintained in secure encrypted cloud storage and/or physical storage as described in Section 3.

Section 5 — Website and Online Privacy

5.1 Website Information

The Firm's website (www.baumontcapital.com) may collect certain non-personally identifiable information through standard web analytics, including browser type, pages visited, and time spent on the site. This information is used solely to improve the website and is not linked to individual client identities.

5.2 Email Communications

The Firm communicates with clients primarily by email. Client emails are maintained securely and are not shared with third parties except as described in this Privacy Policy. Clients who wish to receive communications by an alternative method may request this by contacting the Firm.

5.3 Scheduling Tools

The Firm's website may include, now or in the future, a third-party scheduling tool (e.g., Calendly or similar) for booking consultations. Use of such tools is subject to the privacy policies of those third-party providers. Clients are encouraged to review those policies before submitting personal information through third-party tools.

5.4 Prospect Inquiry Information

Individuals who contact the Firm through the website contact form, by email, or by phone without becoming clients ("prospects") may provide personal information including name, email address, phone number, and details about their investment experience or financial situation. Baumont Capital LLC uses this information solely to respond to the inquiry, provide requested information, and, if applicable, evaluate whether the Firm's services are appropriate for the prospect.

Prospect information is protected with the same safeguards described in Section 3 of this Privacy Policy and is not sold, shared with third parties for marketing purposes, or used for any purpose unrelated to the inquiry. If a prospect does not become a client, the Firm retains the inquiry information only for as long as reasonably necessary to address the inquiry and to comply with applicable recordkeeping requirements, after which it is securely deleted or destroyed.

Section 6 — Special Categories of Information

Baumont Capital LLC does not intentionally collect or store the following categories of sensitive information unless specifically required to provide advisory services:

- Medical or health information;
- Racial or ethnic origin;
- Political opinions or affiliations;
- Religious or philosophical beliefs;
- Biometric data.

If any such information is inadvertently shared during the course of our advisory relationship, it will be treated with the same level of protection as other nonpublic personal information and will not be used for any purpose other than providing advisory services.

Section 7 — Annual Privacy Notice

Baumont Capital LLC is required by Regulation S-P to provide clients with a privacy notice at account opening and annually thereafter for as long as the advisory relationship continues. This notice is provided:

- At account opening: Delivered together with or before the Investment Advisory Agreement;
- Annually: Delivered by email to the client's email address on file, or by mail if the client has no email address on file, during the first quarter of each calendar year;
- Upon material change: Delivered promptly if there is a material change to this Privacy Policy that affects the client's rights.

If you do not receive your annual privacy notice by March 31 of any calendar year, please contact us at info@baumontcapital.com or (316) 204-6058 to request a copy.

Section 8 — Contact and Questions

If you have questions or concerns about this Privacy Policy or about how Baumont Capital LLC handles your personal information, please contact us:

Firm Name	Baumont Capital LLC d/b/a Baumont Capital Management
Principal Contact	Rayan Charles Hassan Hajj Ali, Managing Member
Address	2021 North Ridgewood Drive, Wichita, KS 67208
Phone	(316) 204-6058
Email	info@baumontcapital.com
Website	www.baumontcapital.com

If you believe that Baumont Capital LLC has not complied with this Privacy Policy or applicable privacy laws, you may also contact the Kansas Office of the Securities Commissioner at (785) 296-3307 or securities@ks.gov.

