

PRIVACY POLICY

March 2020

Lapides Asset Management, LLC (“LAM”) values the trust our clients and investors place in us, and we are committed to the responsible management, use and protection of your personal information.

Information LAM Will Collect

LAM must collect certain personally identifiable information in order to properly manage client or investor accounts that may include:

- Information we receive from the client or investor upon opening an account, such as social security or Tax ID number, assets, transaction history, wire instructions.
- Information we generate to service our clients’ or investor’s accounts (in addition to account statements and trade tickets this would include information such as allocation of gains and losses as well as fees and income generation).
- Information we receive from third parties with respect to our clients’ or investor’s accounts (such as trade confirmations from brokerage firms).

Protecting the Privacy of Client/Investor Records and Information

LAM does not disclose nonpublic personal information to third parties other than as described below:

- Required by law.
- At the direction of the client or investor.
- Necessary for providing the best service to the client or investor.

LAM has not and will not sell personal information to anyone for any reason.

Who Receives Information

In order to properly manage our clients’ or investor’s accounts, LAM may also disclose limited aspects of our clients’ or investors’ personal information to the following:

- The Securities and Exchange Commission and/or other government or regulatory entities (all records are subject to examination during audits).
- Brokers (for trading purposes).
- LAM’s auditors, attorneys and independent contractors.
- Consultants and other intermediaries upon client or investor request or approval.

How LAM Protects Your Information

LAM maintains physical, electronic and procedural safeguards to guard your nonpublic personal information from unauthorized access and to ensure we are complying with industry best practice and Federal law. These safeguards include computer safeguards and secured files and buildings. Employees only have access to nonpublic client information as needed to complete their job function and our Code of Ethics, which applies to all employees, restricts the use of client and investor information and requires it be held in strictest confidence.

In compliance with SEC Regulation S-P, a copy of this privacy statement is provided to each client and investor upon entering into an advisory or limited partnership agreement with LAM, and to all existing clients and investors in the event of a material change. As a courtesy, LAM provides a copy of the privacy statement to all clients and investors on an annual basis, regardless of whether there have been changes.

Anyone with questions or requesting additional information is invited to contact: James F. Betz, COO/CCO, Lapides Asset Management, LLC, 500 W. Putnam Avenue, 4th Floor, Greenwich, CT 06830 or jb@lapides-am.com
500 West Putnam Ave., 4th Floor, Greenwich, CT 06830 / Main 203 422 7202 / Fax 203 422 7205 / Web www.lapides-am.com