

PRIVACY NOTICE

Our Promise to You

As a client of Tortoise Investment Management, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number;
- Information regarding securities transactions effected by us; and
- Client financial information such as net-worth, assets, income, bank account information and account balances.

How We Manage and Protect Your Personal Information

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, in order to process a transaction or service an account. In addition, we may disclose information as authorized by applicable law or to comply with judicial process or government regulatory authorities. Additionally, we may share information with outside companies that perform administrative services for us. However, our contractual arrangements with these service providers generally require them to treat your information as confidential.

We maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy, which every employee must sign, restricts the use of client information and requires that it be held in strict confidence.

Client Notifications

We choose to provide you annually a notice describing our Privacy Policy. In addition, we will inform you promptly if there are any material changes to our policy.

Please do not hesitate to contact us with questions about this notice.