

ANNUAL DISCLOSURE STATEMENT

Cardea Capital Group, Inc. (“CCG”) is an independent investment adviser registered with the U.S. Securities and Exchange Commission under the Investment Advisers Act of 1940, as amended. LCP Institutional is a division of CCG in which advisory services are offered. This notice contains important information regarding your account with CCG. Please read it carefully and contact your Investment Adviser Representative with any questions.

PRIVACY POLICY

As our customer, you trust us to help you achieve financial success and security. Respecting and protecting your privacy is among our highest priorities and is vital to our business. By explaining our Privacy Policy to you, we trust that you will understand how we protect the privacy of the personal information you share with us.

What Information Do We Collect?

The types of non-public personal information we collect may include your name, address, e-mail address, social security number, driver’s license number, passport number, income, net worth, financial account information (balances, transactions, holdings) and your beneficiaries.

The information we collect is obtained from you from the applications, new account forms, client profiles, and other forms you may prepare for us that is needed to administer and service your business with us.

How Do We Use and Disclose Your Information?

The main use of your information is to confirm your identity in the course of business that we perform for you. We also use your information to design and manage your portfolio so that it is suited to your needs and objectives. Your information may also be used to comply with the laws and regulations that govern us.

Information is disclosed to non-affiliated third-party entities that provide business services to us related to our transactions with you. For example, the custodian you have chosen in your Investment Advisory Agreement (Banque Pictet & CIE SA or US Bancorp Investments, Inc.), along with additional companies providing software that enable us to send reports, including quarterly statements, all have access to your information. These entities must agree to keep your information private and are not permitted to use or share your information for any other purposes.

Information may be disclosed when it is required by law. For example, any regulatory authority performing an audit on our books and records may have access to your information, or a law enforcement agency that is helping us to report or prevent fraud.

How Do We Protect the Security of Your Information?

We have policies to maintain physical, electronic, and procedural safeguards to protect the confidentiality of your personal information. Access to personal information is available only to those who need to know it in order to service your business.

In the event that you should close your account with us, we will continue to follow the privacy policy described in this notice to the extent that we retain information about you. If we no longer need to retain the information, we dispose of it in a secure manner.

Do You Need to Do Anything?

It is not necessary for you to take any action. This is because we do not share your information except to service the business you have requested from us. You do not need to “opt-out” or “opt-in” as you may have done with other financial companies.

BUSINESS CONTINUITY PLAN

developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us

If after a significant business disruption, you cannot contact us as you usually do at 770-977-7779, you should contact the individual account custodian companies (at their respective phone numbers or web site addresses). Since we don't maintain custody of customers' funds or securities, we rely on our custodians for order execution, comparison, allocation, clearance, settlement of securities transactions, maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical suppliers and data vendors; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

CCG maintains both electronic and hard copy books and records. Electronic records are backed up regularly. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by their objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments as soon as possible. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business as quickly as possible. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business. In either situation, we plan to continue in business and to notify you through whatever means available. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

If you should have questions regarding Cardea Capital Group, Inc. Privacy Policy, please call:

Local Office: 770-977-7779



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