



MC ELHENNY SHEFFIELD

CAPITAL MANAGEMENT

EXHIBIT B – PRIVACY POLICY

McElhenny Sheffield Capital Management, LLC

To Clients and Prospects:

At McElhenny Sheffield Capital Management, LLC, we consider privacy to be fundamental to our relationship with our Clients. We are committed to maintaining the confidentiality, integrity and security of our current and former Clients' non-public information. Accordingly, we have developed internal policies to protect confidentiality while allowing Clients' needs to be met.

We respect your right to privacy. We also know, however, that you expect us to conduct our investment program in an accurate and efficient manner. To do so, we must collect and maintain certain non-public information about you and our other Clients. We collect this information from sources such as subscription agreements and other documents.

We will not disclose any non-public personal information about Clients who are individuals, except to our affiliates and service providers as allowed by applicable law or regulation. In the normal course of serving our Clients, information we collect may be shared with companies that perform various services, such as our accountants, auditors, attorneys, broker-dealers and administrator. Specifically, we may disclose to these service providers non-public personal information, including:

- Information we receive on subscription agreements or other documents, such as name, address, account or tax identification number, and the types and amounts of investments; and
- Information about transactions with us, our affiliates, or others, such as participation in other investment programs, ownership of certain types of accounts or other account data.

Any party that receives this information must agree to use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose. To protect the personal information of individuals, we permit access only by authorized employees who need access to that information to provide services to us and to our Clients.

To guard Clients' non-public personal information, we maintain physical, electronic, and procedural safeguards that comply with U.S. federal standards. An individual client's right to privacy extends to all forms of contact with us, including telephone, written correspondence, and electronic media, such as the Internet.

We note, however, that notwithstanding the foregoing, we reserve the right to disclose non-public personal information about Clients to any person or entity, including without limitation any governmental agency, regulatory authority or self-regulatory organization having jurisdiction over us or our affiliates, if (i) we determine in our discretion that such disclosure is necessary or advisable pursuant to or in connection with any United States federal, state, or local, or non U.S., law, rule, regulation, executive order or policy, including, without limitation, any anti-money laundering law and the USAB-1PATRIOT Act of 2001 and (ii) such disclosure is not otherwise prohibited by law, rule, regulation, executive order or policy.

Sincerely,
Bruce Fraser
Chief Compliance Officer