

KIRR, MARBACH & COMPANY, LLC PRIVACY POLICY NOTICE (SEPTEMBER 2025)

In the course of doing business with Kirr, Marbach & Company, LLC, you share non-public personal and financial information (your “Information”) with us. We treat your Information as confidential and recognize the importance of protecting access to it.

You typically provide your Information when you complete account application forms and/or investment management agreements or when you request advice or help with a transaction that involves assets we manage in your behalf. Your Information may include your name and address, telephone number, Social Security or taxpayer identification number, schedule of assets and liabilities, income, account balances, investment activity, investment performance and information about accounts you may have at other institutions. We maintain high standards to safeguard your Information as part of the trust inherent in a relationship where your interests come first.

We do not rent or sell Information about current or former clients or their accounts to nonaffiliated third parties, and we do not disclose such Information to nonaffiliated third parties unless necessary to process a transaction, service your account or as otherwise permitted or required by law.

We maintain physical, electronic and procedural safeguards designed to protect your Information. Kirr, Marbach & Company, LLC employees need to access your Information in order for us to provide investment management services to you. Our employees are required to maintain and protect the confidentiality of your Information at all times. Access to client files is limited and historic files are backed-up regularly.

Because our clients’ assets are held in custody by nonaffiliated third-party banks or brokerage firms and security transactions are executed through nonaffiliated third-party broker-dealers, electronic communication networks and clearing brokers, it is necessary to provide certain identifying Information to those entities. In all such cases, we provide the nonaffiliated third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. We will, of course, release more specific Information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (e.g., to protect your account from fraud or to file security litigation damage claims in your behalf).

We utilize the services of a limited number of nonaffiliated third-parties who we have retained to perform “processing and servicing” duties including, but not limited to, maintaining our internal management information systems, performance verification, proxy voting and other day-to-day functions of our business. These nonaffiliated third-parties are also required to maintain and protect the confidentiality of your Information at all times.

As required by federal law, we are providing this policy to existing customers on an annual basis. We reserve the right to modify this policy at any time, but will notify you of any material changes. The provisions of this notice apply to both current and former clients.