

January 30, 2025

RE: **O'Shaughnessy Asset Management, LLC (Annual ADV Letter)**\*

Dear Client:

As a client of O'Shaughnessy Asset Management, LLC, pursuant to the ongoing written disclosure requirement placed upon registered investment advisers, on an annual basis we are required to offer to you our most recent written disclosure statement as set forth on Part 2 of Form ADV and make available to you a copy of our firm's Privacy Notice enclosed herein.

Please note, ADV Part 1 Item 5 and ADV Part 2A Item 4 have been amended in accordance with the SEC's Annual Amendment Regulations to update our firm's Assets Under Management and Client Accounts.

Please also note, some additional and enhanced disclosures in ADV Part 2 Items 5, 8, & 10, Strategies, Fees, and Financial Industry Activities and Affiliations regarding Canvas® and third-party service providers have been made as well.

Be advised, our Form ADV Part 2 is available on our web site [www.osam.com](http://www.osam.com) or if you wish to receive a hard copy of our Form ADV Part 2 free of charge, please contact Claudine Spence at [claudine.spence@osam.com](mailto:claudine.spence@osam.com) or 203-975-3306. Our Form ADV Part 1 can also be found by searching on the SEC's IAPD website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) as well.

O'Shaughnessy Asset Management, LLC and/or your adviser continue to manage your investment assets in accordance with your most current designated investment objective(s). If your investment objectives have changed, please inform your adviser, in writing, at your earliest opportunity. Unless and until you notify us otherwise in writing, your adviser will assume that your investment objectives remain the same and your adviser shall continue to manage your assets in the current manner. Please also advise us if you have not been receiving periodic statements from the account custodian.

Should you have any questions, please contact your adviser.

Sincerely,



Raymond Amoroso, III, Esq., Chief Compliance Officer

See reverse for: **O'Shaughnessy Asset Management, LLC** *Privacy Notice*

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\* Please also see latest copy of OSAM's important GIPS Reports at [http://www.osam.com/pdfs/Composite\\_Disclosures.pdf](http://www.osam.com/pdfs/Composite_Disclosures.pdf) for your reference.

## **PRIVACY POLICY:**

Investment advisers, like all providers of personal financial services, are now required by law to inform their clients of their policies regarding the privacy of client information. Investment advisers have been and continue to be bound by professional standards of confidentiality that are even more stringent than those required by law. Therefore, we have always protected your right to privacy.

*Types Of Nonpublic Personal Information We Collect:* We may collect nonpublic personal information about you that may be either provided to us by you or may be obtained by us with your authorization. This personal information generally may include, but is not limited to the following: identification data and data we use to communicate with account holders and investors, such as their name, position, current and former addresses (private and professional), telephone number (private and professional), email address, age/date of birth, place of birth, nationality, sex, civil status and a photograph; identification numbers we receive from account holders and investors or third parties, such as tax, passport, national or other identification number; personal bank account and financial information such as account identification and number, income and (for professional investors) financial license.

*Parties To Whom We Disclose Information:* For current and former clients, we do not disclose and do not wish to reserve the right to disclose any nonpublic personal information obtained in the course of our business except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees, affiliates, parent companies and, in limited situations, to unrelated third parties (including but not limited to, i.e., service providers, proxy voting servicers, index providers, and back office operational professionals, etc.) who need to know that information to assist us in providing services to you that you request or authorize. In all such situations, we stress the confidential nature of information being shared.

*Protecting the Confidentiality and Security of Current and Former Clients' Information:* We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic and procedural safeguards that comply with our professional standards. Please call if you have any questions, because your privacy, our professional ethics, and our ability to provide you with quality financial services are very important to us.

## **CONTACT INFORMATION:**

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