

## Privacy Policy

This notice is being provided to you in accordance with Regulation S-P, privacy rules promulgated under section 504 of the Gramm-Leach-Bliley Act.

These rules govern the privacy of consumer financial information. Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information. \*

We collect personal information to do financial planning and to perform our investment management responsibilities.

1. We do not sell or release your personal information to anyone.
2. We do not disclose any nonpublic information about our customers, consumers or former customers to anyone, except as required or permitted by law or by your consent.
  - In limited circumstances where we believe in good faith that disclosure is required or permitted by law, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as financial service companies, consultants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

Outside of this exception, we do not share your personal information with third parties unless you have specifically asked us to do so.

We collect personal information in the normal course of business in order to provide planning and investment management services.

➤ Categories of Information Collected:

Information our clients provide to us to complete their financial plan.

Information our clients provide to us in agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts.

Information our clients provide to us orally; and Information we may receive from third parties, such as brokerage firms, about our clients' transactions with us or with others.

3. We protect the confidentiality and security of your personal information.
  - We restrict access to confidential personal information about you to those employees who need to know that information to provide services to you.
  - We maintain physical, electronic, and procedural safeguards to comply with federal and state standards to guard your confidential personal information.
4. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.

➤ If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.

5. We will provide notice of changes in our information sharing practices.

➤ If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt-out of such disclosure.

\* Nonpublic personal information means personally identifiable information and any list, description or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available.