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## **PRIVACY POLICY**

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

## TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information.

## PARTIES TO WHOM WE DISCLOSE INFORMATION

Investment Advisers may need to share personal information to run their everyday business. We use your personal information only for the reasons listed below and only share your information with external parties at your request or as required by law.

How your information is used:

- For everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing to offer our products and services to you;

## PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building. We do not share your non-public information with either affiliated or non-affiliated entities other than required by law, unless you request that we do so. We will not share your non-public information for marketing purposes with either affiliated or non-affiliated purposes.

**DEFINITIONS:** Affil<u>iates – companies</u> related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.