

# **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 more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information, and requires us to describe how we collect, share, and protect your personal information.

### Types of Nonpublic Personal Information (NPI) We Collect

We collect NPI 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, account numbers, and balances, sources of income, credit card numbers, etc.

#### **Parties to Whom We Disclose Information**

All Investment Advisers may need to share personal information to run their everyday business. These are the typical reasons we may share your personal information:

- For everyday business purposes such as to process your transactions, to maintain your accounts, or to respond to court orders or legal investigations;
- For our marketing and to offer products and services to you, or for joint marketing with other financial companies;
- For our affiliates' everyday business purposes such as information about your transactions

# **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 offices.

# Federal Law Gives You the Right to Limit Sharing (Opting-Out)

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following:

- Sharing for affiliates' everyday business purposes information about your creditworthiness;
- Sharing with affiliates who use your information to market to you;

State laws and individual companies may give you additional rights to limit sharing.

### **Definitions**

Affiliates – Companies related by common ownership or control that can be financial or non-financial Non-Affiliates – Companies not related by common ownership or control that can be financial or non-financial Joint Marketing – A formal agreement between non-affiliated financial companies that market financial products or services to you together

Please contact your Investment Adviser Representative if you would like to opt-out of sharing your non-public information or if you have any questions. Your privacy, our professional ethics, and the ability to provide you with financial services is very important to us.