



## Privacy Policy

- We consider client privacy to be a fundamental aspect of our client relationships.
- We are committed to maintaining the confidentiality, integrity, and security of our current, prospective and former clients' personal information.
- We are required by law to deliver this Privacy Statement to you annually, in writing.

### Information We Collect

In the course of providing you with advisory services, we may collect, retain, and use client information for the purpose of administering our operations, providing client service, and complying with legal and regulatory requirements. This information may come from sources such as account applications, investment policy statements, from your transactions, and other forms of written, electronic or verbal correspondence from your brokerage, attorney, accountant or other advisor you may employ.

### Information We Disclose

We do not sell personal non-public information about our clients to anyone.

We do not exchange, or disclose client information with outside organizations unless the third party is essential in administering our operations or except as required or permitted by law. No confidential information, whatever the source, regarding any customer or client, may be disclosed except the following:

- We reserve the right to disclose or report personal information where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities.
- Advisor reserves the right to disclose information with other Advisor employees in connection with the Advisor's business and to non-affiliated third parties necessary to service and maintain customer accounts including effectuating a transaction.
- Advisor may disclose information about client or client's account to a non-affiliated third party at client's written request.

### How Information Is Safeguarded

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of your information. These include a secure office environment and password-protected user access to our computer files.