



Commitment to Privacy

We consider the privacy of our clients to be fundamental to our relationship with our clients. We are committed to maintaining the confidentiality, integrity and security of clients' personal information entrusted to us. Policies have been developed to protect this confidentiality, while allowing us to serve our clients needs.

In the course of providing products and services, we collect non-public personal information about clients. We do not disclose any non-public personal information about clients to non-affiliated parties, except as directed by clients, as necessary in order to service a client account or as otherwise permitted by law. Your information is used by us or our service providers primarily to complete transactions or account changes that you request or authorize. We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted by law. For example, to cooperate with regulators or law enforcement authorities, such as responding to a subpoena or other legal processes, or to protect accounts from fraud.

INFORMATION WE COLLECT

We collect certain non-public information about you ("Customer Information"). The essential purpose for collecting Customer Information is to allow us to provide advisory services to you. Customer Information we collect may include:

- Information that you provide on applications or other forms. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your transactions with us, or others (e.g., broker-dealers, clearing firms, or other chosen investment sponsors).
- Information we receive from consumer reporting agencies (e.g., credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.

INFORMATION WE DISCLOSE

We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance, we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as, but not limited to, outside broker-dealers, custodians, administrators, transfer agents, attorneys, accountants, and auditors that we need to use to provide our services to you. From time to time, we must give information about our business to regulatory authorities. This may include non-public personal information.

CONFIDENTIALITY AND SECURITY

Access to clients' non-public information is restricted to employees and third parties hired to perform services for us who need access to such information to provide products or services. We have imposed physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect clients' non-public personal information. A clients' right to privacy extends to all forms of contact with us, including telephone, written correspondence and electronic media. We do not sell personal non-public information about our clients to anyone.

REVISED POLICY AND PRACTICES

As required by federal law, we will send you notice of our privacy policy annually, as long as you have an account with us. We may revise our policy in the future and will provide you with a revised policy. We will not revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.