

PRIVACY POLICY

Investment Advisors are required by law to inform their clients of their policies regarding privacy of client information. The Gramm-Leach-Bliley Act of 1999 requires us to tell you how we collect, share, and protect your personal information. To comply with this law, we are providing you with this document, which notifies you of the privacy policies and practices of our firm.

TYPES OF NONPUBLIC PERSONAL INFORMATION 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 and financial account numbers and/or balances, sources of income, credit card numbers or other information.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisors may need to share clients' nonpublic personal information to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal or regulatory investigations, or report to credit bureaus.
- We limit access to information to only those employees who need to know that information in order to provide products or services to you.
- We limit access to information to only those non-affiliated third parties as permitted or required by law – for example, portfolio management and brokerage firms which transact business on your behalf, and federal and state regulators during the course of their inspections.
- For non-affiliated third parties that require access to your personal information, such as portfolio management and brokerage firms, we require strict confidentiality in our agreements with them and expect them to keep this information private.
- We will not discuss your affairs with anyone external to the firm unless we have your specific permission to do so.
- We will not provide your personal information to mailing list vendors or solicitors for any purpose.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENTS' INFORMATION

- Our firm is committed to safeguarding the personal information of our clients. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including maintaining a secure physical office and protecting our computer network and files.
- We are bound by professional standards of confidentiality that are even more stringent than those required by law. We will maintain your files for as long as you are a client, and for as long thereafter as may be required by law and the CFP® Board's Code of Ethics and Professional Responsibility. After this required period of retention, all personal information will be appropriately destroyed.

Your privacy is very important to us. Please let us know if you have any questions.