



Privacy Policy

Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. In accordance with a recent rule enacted by the Federal Trade Commission, professionals who advise on personal financial matters are now to inform their clients of their policies regarding privacy of client information.

A. Types of Information We Collect

We collect certain personal information about you—but only when that information is provided by you or is obtained by us with your authorization. We use that information to provide various investment and financial planning services to you at your request.

B. Parties to Whom We Disclose Information

As a general rule, we do **not** disclose personal information about our clients to anyone without their permission. However, to the extent permitted by law, certain nonpublic information about you may be disclosed in the following situations:

1. To comply with a validly issued and enforceable subpoena or summons;
2. In the course of a review of our firm's practices under the authorization of a state or national licensing or regulatory board;
3. As a part of any actual or threatened legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit and take reasonable precautions to ensure that the information disclosed does not become a matter of public record; and

(continued on reverse side)

4. To provide information to affiliates of the firm and nonaffiliated third parties who perform services or functions for us in conjunction with our services to you, but only if we have a contractual agreement with the other party that prohibits them from disclosing or using the information other than for the purposes for which it was disclosed. If we do not have a contractual agreement, with the other party, we will ask for your consent prior to sharing confidential information with them.

C. Confidentiality and Security of Nonpublic Personal Information

Except as otherwise described in this notice, we restrict access to nonpublic personal information about you to employees of our firm. Their right to further disclose and use the information is limited by the policies of our firm, applicable law, our Code of Professional Conduct, and nondisclosure agreements where appropriate. In order to guard your nonpublic personal information, we maintain physical, electronic and procedural safeguards that comply with our professional standards.

D. Record Retention Policy

We retain records relating to professional services we provide, so that we are better able to assist you with your professional needs, and in some cases, to comply with professional guidelines. Our policy is to maintain copies of your personal financial information for seven years before they are destroyed.

Thank you for allowing us to serve you. We value your business and are committed to protecting your privacy. Please call us if you have any questions regarding our privacy or record retention policies.