



PRIVACY POLICY

We have adopted this policy in recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that our clients expect us to service their account(s) in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about our clients. We want you to know what information we collect and how we use and safeguard that information. We will not sell your non-public personal information to anyone nor will we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal identifying information about our clients (e.g., name, address, social security number) from information that clients provide to us through forms or in other communications, whether electronic, telephone, written, or in person, we have with you, your authorized representatives (e.g., attorneys, accountants, etc.), or other service providers for your account(s). We also collect information about your financial accounts and transactions (e.g., purchases, sales, account balances).

WHAT INFORMATION WE DISCLOSE

We do not disclose the nonpublic personal information we collect about our clients to anyone except: (i) in furtherance of our business relationship and then only to those persons necessary to affect the transactions and provide the services that the client authorizes (e.g., broker-dealers, recordkeepers, etc.); (ii) persons assessing our compliance with industry standards; (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. We are also permitted to disclose the nonpublic personal information about our clients to governmental agencies and, in certain circumstances, other third parties (e.g., third parties that perform administrative or marketing services on our behalf). These third parties are prohibited from using or sharing the information for any purpose. If a client decides to either terminate our services or become an inactive client, we will continue to adhere to our privacy policy, as may be amended from time to time.

SECURITY OF CUSTOMER INFORMATION

We restrict access to client's nonpublic personal information to persons who need to know that information to service the accounts. We maintain physical, electronic, and procedural safeguards that comply with applicable standards to protect your personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH CUSTOMERS

Our policy about obtaining and disclosing information may change from time to time. We will provide clients with notice of any material change(s) to this policy before we implement the change.

QUESTIONS

You are encouraged to ask us questions or voice any concerns regarding our privacy policies by contacting us.

