



# Privacy Notice

## Our Commitment

You have retained us as your investment adviser and have entrusted us with your personal and financial data. We recognize that our relationship is based on trust, and that you expect us to act in your best interests to the extent of our capabilities. Because your personal and financial data are your private information, we hold ourselves to a high standard in their safekeeping and use.

**This means that we do not sell or share for marketing purposes any client or prospective client information with anyone — whether it is your personal information or the fact that you are, or may become, our client.**

Instead, we use your information primarily to complete transactions that you request or to make you aware of other financial products and services that we offer.

## The Information We Collect About You

You have given us significant personal information as a required part of creating a relationship with us. You have also provided personal information as part of opening investment accounts, brokerage, insurance or other related accounts necessary to allow us to provide financial services to you.

In addition to personal information you provide to us, we may receive information about you that you authorize third parties to provide to us. We also may obtain personal information from third parties in order to verify your identity, to prevent fraud, or to help us identify products and services that may benefit you.

Personal information collected from any source may include, among other things, your name and address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, and accounts at other institutions.

## How We Handle Your Personal Information

We do not sell information about current or former clients or their accounts to third parties. Nor do we share information about clients or prospective clients, except when needed to complete transactions at your request or to provide you with administrative and account services. For example:

- In order to complete certain transactions or account changes that you direct, it may be necessary to provide identifying information to companies, individuals, or groups with whom we are not affiliated. For example, if you ask to transfer assets from another financial institution to an account for which we provide investment advisory services, we will need to provide certain information about you to that company to complete the transaction.
- In certain instances, we contract with nonaffiliated companies to perform services for us and for your account. Where necessary, we will disclose information we have about you to these third parties. In all such cases, we provide the third party with only the information

necessary to carry out its assigned responsibilities, and only for that purpose. Our third parties will also treat your private information with the same high degree of confidentiality that we do. For example, we utilize an account administrator to create and disseminate account statements and performance reporting.

- Finally, we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example, to prevent fraud).

## Protecting Electronic Information

Our concern for the privacy of our clients includes those who communicate with us by e-mail and use the websites of custodians and account administrators.

Our custodians and account administrators use data encryption, user names and passwords. These technologies provide a high level of security and privacy when you access your account information. Most e-mail communications are not encrypted. Please do not send us account identity information via e-mail. We will not contact you asking for this type of information.

## How We Protect Your Information

To protect your personal information, we maintain physical, electronic, and procedural safeguards in keeping with industry standards and practices, and we review and adjust these safeguards regularly in response to advances in technology. We require the firms that provide us with services for your account to execute contracts providing for confidential treatment of your information.

## What You Can Do

For your protection, we strongly recommend that you do not provide your account information, user name, or password to anyone. If you become aware of any suspicious activity relating to your account, it is your responsibility to contact us immediately. At no time will we contact you and ask for your user name and password.

## We'll Keep You Informed

As required by federal law, we will notify you of our privacy notice annually. We reserve the right to modify this notice at any time, but rest assured that if we do change it, we will tell you promptly. Should you have concerns at any time, please call.

## Update Your Information

Should you have significant life changes, such as a marriage, birth of a child, change of contact information, death of a spouse or divorce or other significant change in your financial position, please contact us to determine if such changes will alter your investment objectives, risk tolerance or investment horizon.

*Revised February 2024*