

Advisor Privacy Policy

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to non-affiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Advisor does not share or disclose customer information to non-affiliated third parties except as permitted or required by law.

Advisor is committed to safeguarding the confidential information of its clients. Advisor holds all personal information provided by clients in the strictest confidence and it is the objective of the Advisor to protect the privacy of all clients. Except as permitted or required by law, Advisor does not share confidential information about clients with non-affiliated parties. In the event that there were to be a change in this policy, Advisor will provide clients with written notice and clients will be provided an opportunity to direct Advisor as to whether such disclosure is permissible.

To conduct regular business, Advisor may collect personal information from sources such as: Information reported by the client on applications or other forms the client provides to Advisor Information about the client's transactions implemented by others. Information developed as part of financial consultations and analyses

To provide related services for client accounts, it is necessary for the Advisor to provide access to customer information within the firm and to non-affiliated companies with whom Advisor has entered into agreements. To provide the utmost service, Advisor may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the Advisor's behalf.

Information Advisor receives from the client on applications (name, social security number, address, assets, etc.), information about the client's transactions with others (account information, payment history, parties to transactions, etc.), information about a client's financial products and services transaction with the Advisor

Since Advisor shares non-public information solely to service its client, Advisor does not disclose any non-public personal information about the Advisor's customers or former customers to anyone, except as permitted by law. However, Advisor may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.