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PRIVACY POLICY

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law.

Federal Law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

1. TYPES OF NON-PUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect non-public 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, Financial Account Numbers and/or Balances, and Sources of Income.

2. PARTIES TO WHOM WE DISCLOSE INFORMATION

No confidential information is released to any other person or organization except for under the following circumstances:

- Custodians - Required information furnished for opening and servicing accounts
- Securities and Exchange Commission (SEC) - Upon formal request including other lawful requests (i.e. subpoenas)

3. PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

Your security privacy is our top priority. Please contact us at (585)236-8501 if you have any questions or concerns.