Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust. We do not sell your personal information to anyone. We collect personal information to perform our investment management responsibilities.

Throughout this policy, we refer to information that personally identifies you or your accounts as "personal information."

1. **We do not sell your personal information to anyone.**
2. **We do not disclose personal information to third parties, unless the following limited exception applies.**

- We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit / authentication checks, or for institutional risk control or when authorized to the clients' accounting/law firm.

Outside of this exception, we will not share your personal information with third parties unless you have specifically asked us to do so.

3. **We do collect personal information in the normal course of business in order to provide investment management services.**

- *New client information.* We collect information that you provide to us when you become a client. The information we collect includes name(s), address, phone number, email address, Social Security number(s), and other information about your investing needs.

4. **We protect the confidentiality and security of your personal information.**

- We restrict access to personal information to our staff and for business purposes only.
- We maintain physical, electronic, and procedural safeguards to guard your personal information.

5. **We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**

- If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.

6. **We will provide notice of changes in our information sharing practices.**

- If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.