

We appreciate your business and the trust you have placed in us. Our privacy philosophy reflects the value of your trust. We are committed to protecting the personal data we obtain about you. Please know that we do not sell your personal data. In order to provide services or products to you, we may use your personal data. To further understand our Privacy Policy, please review the following details.

WHAT PERSONAL DATA WE MAY COLLECT ABOUT YOU?

We may collect your personal data to provide you with the products or services you requested. We may obtain it from your application, your transactions with us, and outside parties such as consumer reporting agencies. We may collect personal data about you to process transactions and to prevent fraud. Where required, we will obtain your consent before collecting it. The personal data may include:

- Name, address and other personal information
- Income and assets
- Accounts at other institutions
- Social security, Driver's Licenses, or taxpayers identification number

WHAT WE DO WITH YOUR PERSONAL DATA?

We comply with federal and State requirements related to the protection and use of your data. This means that we only share data where we are permitted or required to do so to provide services to you. We also may be required to obtain your authorization before disclosing certain types of personal data.

We may use your personal data in order to:

- Process transactions
- Respond to your requests
- Prevent fraud
- Comply with regulatory requirements
- Share with you related products and services we offer

We do not sell personal data about current or former customers or their accounts. We do not share your personal data with any affiliates or outside companies for marketing purposes. When affiliates or outside companies perform a service on our behalf, we may share your personal data with them solely in connection with providing those services. We require them to protect your personal data, and we only permit them to use your personal data to perform these services.

Examples of outside parties who may receive your personal data are:

- Your financial advisor, Bookkeeper, or other authorized agent(s)
- Your brokerage firm or custodian
- State or Federal authorities
- Other companies or service provider we use to provide services to you

HOW WE PROTECT YOUR PERSONAL DATA?

In order to protect your personal data we maintain physical, electronic and procedural safeguards.

Examples of these safeguards are:

- All employees sign a Confidentiality Agreement upon being employed.
- Each employee has a unique login and password for the network.
- Network is protected by a Firewall monitored and maintained by Brightworks Computer Consultant, our outsourced IT consultants.
- Any disposed paper documents are securely shredded on-site.
- Kaspersky Lab Protection against hacker/virus at individual and server level on every computer.
- Off-site backups are managed by XiloCore. Data is transferred using the highest encryption available, both at rest and in transit (AES 256 and FIPS 140-2 certified). XiloCore provides a full audit trail of access to the backup and restore process and the ability to certify data destruction of archival data. Additionally, all data is stored within redundant ZiloCore vaults ensuring that data is always recoverable.
- Emails containing personal data are sent, and received (via our website) utilizing a 256-bit Secure Sockets Layer (SSL) encryption program called ZixPort, a secure web-based portal from ZixCorp.
- Office is protected by a door activated/motion detected/fire 24/7 monitored security system.

OUR COMMITMENT TO KEEPING YOU INFORMED.

Our Privacy Policy is available online and by request. In the event we broaden our data sharing practices we will notify you of our new Privacy Policy.