

SHUTTLEWORTH & COMPANY PRIVACY POLICY:

OUR COMMITMENT TO PRIVACY OF YOUR FINANCIAL INFORMATION

YOUR PRIVACY IS IMPORTANT TO US

Shuttleworth & Company (SCO) is committed to protecting the information you share with us, and in turn respecting your privacy. To help you understand how we protect your personal non-public information (“information”), (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) This Privacy Notice will explain the type of information we collect, how we use and protect that information. We do not offer an opportunity for you to prevent or “opt out” of information sharing since we share personal information with others only allowed by law. You do not need to contact us to benefit from our privacy protections. SCO reserves the right to change this Privacy Statement at any time and will notify you of any changes as required by law.

OUR SECURITY STANDARDS - INFORMATION WE MAY COLLECT AND USE

We have stringent security standards to keep the information we have about you safe. We maintain strict control over access to your information. The only employees of SCO that are permitted to access your information are those with a business need to know.

In order to provide our services to you we must collect information that you provide to us when you open an account and complete an application or other forms. The information we collect includes your name, address, phone number, e-mail address, social security number, date of birth, and employment information. We may collect other information such as your financial and employment history. We may also collect information to confirm your identity.

We may gather information about you from sources such as:

- Brokerage account applications;
- Written, electronic, telephone, and other communications from you;
- Life and disability insurance, and annuity annual account statements and contracts;
- Your transactions with us and others, such as deposits to and withdrawals from your financial account(s); and,
- Employer sponsored retirement plan account statements.

We collect most information at the time of being engaged, however, we may need additional information if you request a change to your beneficiaries for example.

INFORMATION WE MAY DISCLOSE

We make it our priority to protect the information we have about you, but sometimes it is necessary to share your information with others. We may share personal information we have about you as allowed by law. We disclose personal information to third parties that perform services on your behalf, process or service your transactions, or account(s), including companies that print and mail your account statements or other forms of shareholder servicing providing they use the information solely for those purposes.

We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law. Examples are to cooperate with regulators or law enforcement authorities, resolve consumer disputes, and to perform credit/authentication checks.

For certain services, we may engage outside firms to help us develop our service approaches. We may share with such firms certain identifying information, as described above. This helps us to provide you with better service. This also makes it possible for us to advise you of other financial services that we offer to meet your needs.

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

PROTECTING YOUR PERSONAL INFORMATION

Except as described above, we restrict access to information about you to employees of our firm and other parties who must use such information to provide services to you. We also maintain physical, electronic, and procedural safeguards to guard your personal information from unauthorized access, alterations, or premature destruction. When we hire other parties to help us conduct our business, we require them to protect your personal information. Further, we do not permit them to use or share your personal information for any purpose other than the work they are doing on our behalf or as required by law.

We treat the information of our current and former clients in the same manner.

Thank you for trusting us to manage your investments and be your financial advisor. We value your business and are committed to protecting your privacy. Please contact our Chief Compliance officer Erin Maynard at 614-760-7738 if you have any questions or if we can be of further service.

This Privacy Statement is given to you for your information only. You do not need to call or take any action.