

Thrift Financial, Inc.

PRIVACY POLICY

Thrift Financial, Inc. requires that you provide current and accurate financial and personal information. Thrift Financial, Inc. will handle the information you have provided in a safe, secure manner. We are committed to protecting your privacy.

Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, written notations, and documentation provided to us by our customers for investment and consulting services.

During regular business hours, access to customer records is monitored so that only those with approval may access the files. During hours when the company is not operating, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe Thrift Financial, Inc. procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

Thrift Financial, Inc., is committed to the protection and privacy of its customer's and consumers' personal and financial information. Accordingly, Thrift Financial, Inc., will not share such information with any affiliated or nonaffiliated third party except:

- To complete a transaction in a customer account with a clearing firm, account custodian, or similar firm;
- To maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or the attorneys, accountants, and auditors of the firm;
- In connection with a sale or merger of Thrift Financial, Inc.'s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims, or other liability;
- To comply with federal, state, or local laws, regulatory agencies, and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- When the customer instructs us to consent; or
- Pursuant to any other exceptions enumerated in the Pennsylvania Privacy of Consumer Financial Information code, California Information Privacy Act, and Massachusetts Standards for the Protection of Personal Information of Residents of the Commonwealth.

Opt-Out Provisions

Thrift Financial, Inc. does not share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the above circumstances. Since sharing information under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances for clients to opt out or opt-in when applicable.