



Privacy Policy

In 1999 Congress passed the Gramm-Leach Bliley Act (the “GLBA”) in an effort to modernize the American financial markets. In connection with modernizing the financial marketplace, the GLBA established standards for how financial institutions must protect the privacy of consumer financial information. Under the GLBA, the definition of financial institutions includes investment advisers. As an investment adviser I am subject to the provisions of the GLBA and am committed to protecting the privacy of my client’s nonpublic personal financial information. The following clarifies my privacy practices, which are published for you as a result of this law:

As part of my business practices, I obtain certain “nonpublic personal financial information” about my Clients, which for ease of reading will be referred to as “information” in this notice. This information includes data we receive from you on applications or other forms (i.e. your name, address, social security or tax identification number, assets, income, account balances, investment activity and accounts at other institutions), information about your transactions with me, my affiliates or others, and information I may receive from third-party sources.

I restrict access to the information to authorized parties who need to know this information to provide services and products to my Clients. I maintain physical, electronic and procedural safeguards to protect Client information.

I do not disclose, and do not wish to reserve the right to disclose, nonpublic personal financial information of Clients to affiliates or nonaffiliated third parties except under the limited exceptions for processing and servicing transactions and legal requirements. I also do not disclose, and do not wish to reserve the right to disclose, nonpublic personal financial information of former Clients to affiliates or nonaffiliated third parties except under the limited exceptions for processing and servicing transactions and legal requirements.

I only make disclosures of nonpublic personal financial information of my Clients to nonaffiliated third parties as permitted or required by law or consented to by my Clients.

If you decide to close your account(s) we will adhere to our privacy policy, which may be amended from time to time.

In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you.

If you have questions about this privacy notice or about the privacy of your customer information call our main number 614-457-6096 and ask to speak to the Chief Compliance Office