

# Wallem Associates, Inc.

## Privacy Policy

Wallem Associates, Inc. (hereafter referred to as “Wallem”) is committed to client confidentiality and the protection of your privacy. The following information is provided, as required by law, to help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. "Personal information" refers to the nonpublic financial information obtained by Wallem in connection with carrying out our services.

### Information We Collect

Wallem collects personal information as part of our relationship with you in order to provide client services and fulfill legal and regulatory requirements. The type of information Wallem collects may include:

- ▲ Information Wallem receives from you on forms (such as your name, address, Social Security number, profile documents, assets and income);
- ▲ Information you provide Wallem directly about your personal finances or personal circumstances or which Wallem may receive from brokerage statements or other information you authorize Wallem to receive.

### Information Disclosed in Administering Products and Services

Wallem shares your personal information for everyday business purposes, including to process transactions, maintain your account, respond to court orders or legal investigations or report to credit bureaus. Wallem does not sell any personal information about you to any third party. Wallem does not share personal information with our affiliates for marketing purposes. Other than to service your account, Wallem will not disclose personal information to non-affiliated third parties without your authorization, except as required or permitted by law.

### Procedures to Protect Confidentiality and Security of Your Personal Information

Wallem has procedures in place that limit access to personal information to those employees who need to know such information in order to perform business services. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. In addition, Wallem maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

Wallem will update its policy and procedures when necessary to ensure that your privacy is maintained, and that Wallem conducts business in a way that fulfills our commitment to you. If Wallem makes any material changes in its privacy policy, we will provide you notice of any material change to this policy.

If you have questions, please contact Michael Sullivan at 615-636-4459.