

# FIDUCIARY COUNSEL, INC.

REGISTERED INVESTMENT ADVISOR

## Privacy Policy Statement

When Fiduciary Counsel establishes a client relationship with an individual through an advisory contact, Fiduciary Counsel becomes subject to regulations that requires Fiduciary Counsel to adopt policies and procedures to protect the Nonpublic Personal Information of clients and to disclose to such persons policies and procedures for protecting that information.

The purpose of our privacy policies and procedures is to provide administrative, technical and physical safeguards which assist Fiduciary Counsel Personnel in maintaining the confidentiality of Nonpublic Personal Information collected from our clients. All Nonpublic Personal Information, whether relating to Fiduciary Counsel's current or former clients, is subject to our privacy policies and procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

The term "Client" for the purpose of this policy includes natural persons who have a written advisory contract directly with Fiduciary Counsel.

The term Nonpublic Personal Information includes nonpublic "personally identifiable financial information" plus any list, description or grouping of clients. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by Fiduciary Counsel to clients, and data or analysis derived from such Nonpublic Personal Information.

Fiduciary Counsel's policy prohibits any sharing of Nonpublic Personal Information with any non-affiliated third party unless the client authorize such sharing in writing, or if such sharing is necessary to open the client account or to settle a transaction in the client account, such as paperwork required by a third party custodian, account record keeper, or sub advisor.

Fiduciary Counsel's Privacy Policy is provided with our advisory contract. Fiduciary Counsel ensures that all clients who sign our agreement also acknowledge receipt of the Privacy Policy, before or at the time on entering into the agreement. Fiduciary Counsel also delivers our Privacy Policy on an annual basis.

Administrative, technical & physical safe guarding procedures include:

- Policy to NOT share information with nonaffiliated third parties
- Clients are provided our Privacy Policy at the time of entering into a contract
- Client information on computer networks is accessed by passwords or other established controls within our custodians', record keepers', sub advisors' systems to ensure that only authorized persons gain access.
- Requests for customer information from outside parties, such as regulators, IRS, and government agencies are referred to Craig Johnston for review.
- All agreements with custodians, record keepers and sub advisors include their privacy policies.
- Integrity of internal computer systems is subject to regular review.
- All hard-copy Nonpublic Personal Information is secured in locked facilities.

Please do not hesitate to contact us with questions about this notice.