

## privacy notice April 10, 2015

We deliver this Privacy Notice to all our clients initially upon establishing our relationship and annually thereafter. We believe it is important that you understand our uses of the information we gather from you.

In performing our services for you, we may gather non-public personal information about you, as follows:

- Information we receive from you in our conversations, discussions and interviews.
- Information relating to the services we render to you.
- Information you deliver to us in a written or other format, however developed.
- Information prepared and delivered by third parties acting on your behalf.

We do not disclose any nonpublic personal financial information about you to any nonaffiliated third parties, except in the following circumstances:

- When required to execute transactions for your account or otherwise to provide services you have requested; or
- When you have specifically authorized us to do so in writing; or
- To persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.); or
- To our attorneys, accountants, and auditors; or
- When permitted or required by law.

Within our firm, we restrict access to your personal financial information to the employees who need to know that information to provide services to you. We will not communicate your information to anyone unless we have your permission, which is only granted through a form which we have available. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

If you have any questions about our Privacy Notice, we request that you contact us promptly. We value our relationship with you and want to be sure that our policies and procedures are clear and acceptable to you.

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Firm is a registered investment adviser.