

PRIVACY POLICY STATEMENT

The following information will serve as Advisor's initial Privacy Policy Notice to Client. Advisor is a registered investment advisor and in the business of providing investment advisory services to customers.

Advisor is committed to safeguarding the confidential information of its clients. Advisor holds all personal information provided to the firm in the strictest confidence. IARs may also be registered representatives of Silver Oak Securities, Inc. ("SOSI") a registered broker-dealer that is not affiliated with Advisor. Advisor and its IARs may also have relationships with other non-affiliated investment advisors, insurance companies, trust companies, custodians and other financial institution entities. In some instances, Client may choose to have Advisor consult with Client's own attorney, accountant or other outside party for the purpose of preparing necessary accounting or legal paperwork necessary for the implementation of Client's financial plan. In these instances, Advisor will provide information to a Client's attorney, accountant or other outside party in connection with the advisory services provided only when Client authorizes Advisor to consult with such parties. Except as required or permitted by law or when directed by Client, Advisor does not share confidential information about Client with non-affiliated third parties. In the unlikely event there were to be a change in this fundamental policy that would permit additional disclosures of Client's confidential information, Advisor will provide written notice to Client, and Client will be given an opportunity to direct Advisor as to whether such disclosure is permissible.

AN IMPORTANT NOTICE CONCERNING CUSTOMER PRIVACY

Customer Information Collected. Advisor collects and develops personal information about Clients, and some of that information is non-public personal information ("Customer Information"). The essential purpose for collecting Customer Information is to provide and service the financial products and services Client obtains from Advisor. The categories of Customer Information collected by Advisor depend upon the scope of the engagement with Advisor and are generally described below. As an investment advisor, Advisor collects and develops Customer Information about Client in order to provide investment advisory services. Customer Information Advisor collects includes:

- Information Advisor receives from Client on financial inventories through consultation with Advisor's IARs. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning Client's financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about Client's financial products and services transactions with Advisor.

Data Security. Advisor restricts access to Customer Information to those IARs and employees who need the information to perform their job responsibilities. Advisor maintains agreements, as well as physical, electronic and procedural securities measures, that comply with federal regulations to safeguard Customer Information about Client.

Use and Disclosure of Customer Information to Provide Customer Service for Client Accounts. To administer, manage and service client accounts, process transactions and provide related services for Client's accounts, it is necessary for Advisor to provide access to Customer Information within Advisor and to non-affiliated companies such as SOSI, other investment advisors, other broker-dealers, trust companies, custodians and insurance companies. Advisor may also provide Customer Information outside of Advisor as permitted by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

Former Clients. If Client closes an account with Advisor, Advisor will continue to operate in accordance with the principles stated in the Notice.

Requirements of Federal Law. In November of 1999, Congress enacted the *Gramm-Leach-Bliley Act* ("GLBA"). The GLBA requires certain financial institutions, including broker-dealers and investment advisors, to protect the privacy of Customer Information. To the extent a financial institution discloses Customer Information to non-affiliated third parties other than as permitted or required by law, clients must be given the opportunity and means to opt out (or prevent) such disclosure. Please note that Advisor does not disclose Customer Information to non-affiliated third parties except as permitted or required by law (e.g., disclosures to service Client's account or to respond to subpoenas) or when directed by Client to disclose such information.