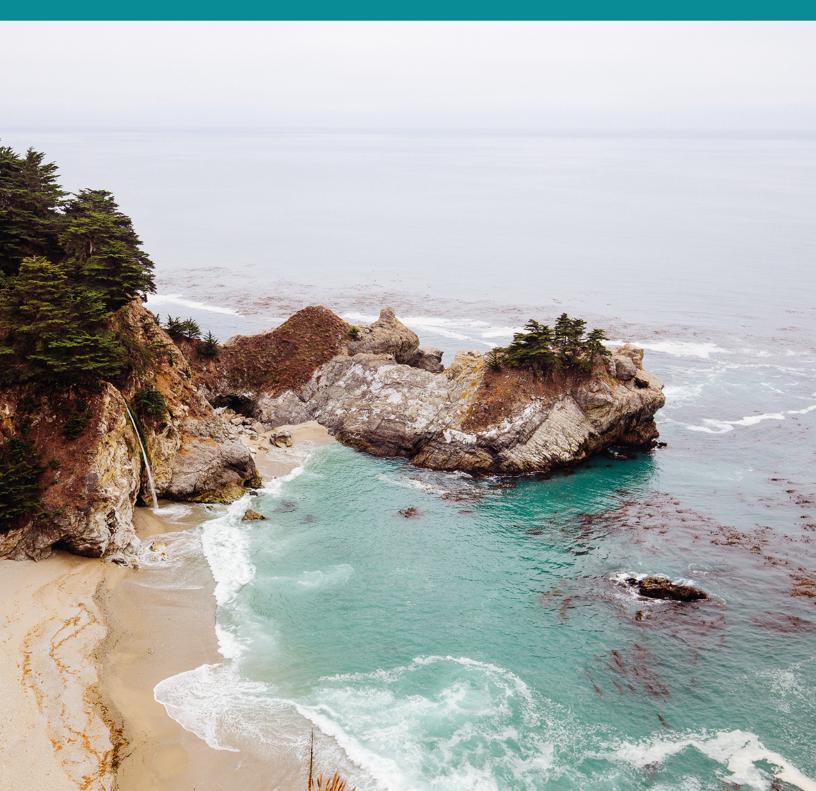


## PRIVACY POLICY



## PRIVACY POLICY & INFORMATION SECURITY

We value your business and take extensive measures to safeguard the privacy and integrity of the information our firm gathers, stores, and archives during normal business operations.

Your data records include all information that we collect from you on applications or other forms, and transactional information with us or others, in connection with services provided. We secure all personal information in the strictest confidence and retain this information on a secure Class A electronic database which utilizes the most up-to-date SSL encryption, firewall, intrusion detection, backup and co-location systems. This is in full compliance with federal and state regulations.

We will never disclose your information to nonaffiliated third parties, except as described in this privacy statement or as permitted by law. If we were to anticipate such a change in Firm policy, we would be prohibited under law from doing so without advising you first.

We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. Federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or for our Firm to discuss your financial situation with your accountant, lawyer, insurance agent or broker, or other professional representative, only with your written permission.

The categories of nonpublic personal information that we collect from you depend upon the scope of our engagement. It will include information about your personal finances, your health to the extent that it is needed and, if necessary, third party transactional data. We use health and financial information to help meet your personal financial goals while guarding against any real or perceived infringements of your medical rights.

For unaffiliated third parties that require access to your personal information, including financial service companies and auditors, we also require strict confidentiality in working with them and expect them to keep this information private. Federal and state regulators may also review the Firm's records as permitted by law.

## We will never provide or sell your personal identifiable information to mailing lists or solicitors for any purpose.

Personal identifiable information will be maintained during the time you are an active client, and for a minimum of six (6) years upon termination of your Investment Advisor Contract, beginning on December 31 of that year. This is in accordance with federal and state securities record retention laws. After this required period, all such information will be destroyed under strict supervision.

Please contact us directly if you have any questions about the policy or procedures outlined.

Stephen A. Duck

Stephen A. Duck CERTIFIED FINANCIAL PLANNER™ President & Director of Wealth Management



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