

Smith Associates, LLC.

Privacy Notice

When you use Smith Associates, LLC. as your investment advisor, you entrust us not only with your hard-earned assets but also with your personal and financial data. We consider your data to be private and confidential, and we hold ourselves to the highest standards of trust in their safekeeping and use.

Smith Associates utilizes information that you make available in order to provide you with the services and information you require; it is our goal to exceed your expectations. The types of information Smith Associates may collect during the normal course of business may include: information provided in applications, forms, questionnaires and investment management agreements. This information may be gathered in written or verbal form, dependent upon applicable state and federal laws and regulations. Personal information we may collect could include but is not limited to your name, address, phone number, account information, social security number, employment, assets, income and debt levels; information regarding transactions, accounts, balance information; trading activity and parties to transactions; information from other outside sources, beneficiary information, and any other information that is deemed to be nonpublic personal information as defined by the Gramm-Leach-Bliley Act and the SEC Privacy Rule (Regulation S-P).

We also collect nonpublic personal information about clients such as you from the following sources:

- Information about your transactions with us, our affiliates, or others, and
- If you visit our web site, we may collect information via a web server, often referred to as a “cookie.” Cookies indicate where a site visitor has been online and what has been viewed.
- We get information about you from credit bureaus.
- Some information about you is public information. Your phone number is considered public information if it is in a telephone book. But your phone number is considered nonpublic information if it is unlisted.
- Your right to decide whether we share your information only applies to such nonpublic information. That means that even if you opt out we can still share public information about you with other companies.

We do not disclose any nonpublic personal information about our customers or former customers to anyone other than issuers, escrow agents, custodians, other brokerage firms (if needed) and possibly clearing firms, except as permitted by law. Moreover, we will not release information about our customers or former customers unless one of the following conditions is met:

- We receive your prior written consent.
- We believe the recipient to be you or your authorized representative.
- We are required by law to release information to the recipient.

We only use information about you and your account to help us better serve your investment needs or to suggest services or educational materials that may be of interest to you.

To further protect your privacy, we maintain physical, electronic and procedural safeguards to guard your personal account information. We also restrict access to your personal and financial data to authorized Smith Associates advisers who have a need for these records. We advise you not to send such information to us in non-secure e-mails. A message sent through the website contact form should be general in nature. No private or sensitive personal or account information should be transmitted.

Confidentiality and Security

We maintain physical, electronic and procedural safeguards to guard your personal account information. We also restrict access to your personal and financial data to authorized Smith Associates advisers who have a need for these records. We require all non-affiliated organizations to conform to our privacy standards and are contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

We will continue to conduct our business in a manner that conforms with our pledge to you, your expectations and all applicable laws.