

## *Our Privacy Policy*

In providing financial services and products to you, we collect certain nonpublic information about you. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to you, or as permitted by law. Protecting your privacy is important to us.

### *Information We Collect*

The nonpublic personal information we have about you includes what you give us when you open an account or communicate with us. This could include:

- Your name and address
- Social Security Number
- Investment objectives and experience
- Financial circumstances
- Employment
- Account balance and account transactions.

### *Information We Disclose*

We disclose nonpublic personal information about you to third parties that we hire to help us provide products and services to you, or as permitted by law or authorized by you. Except in those specific, limited situations, without your consent, we will not make any disclosures of information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists, and we will not sell your name to a catalog company or telemarketer.

### *How Information Is Used*

We use information about you to provide our asset management and financial planning services to you, such as managing your investment account. We may disclose this information to third parties as permitted by law, including the outside broker-dealers, custodians, administrators, transfer agents, accountants or attorneys that we need to use to provide our services to you. From time to time, we must give information about our business to regulatory authorities. This may include personal information about you.

We do not sell personal non-public information about our Clients to anyone.

### *How Information Is Safeguarded*

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of your information. These include confidentiality agreements with companies we hire to help us provide services to you, password-protected user access to our computer files and strict confidentiality policies that apply to all Compass personnel.

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