

## **3(38) Investment Fiduciaries PRIVACY POLICY**

At 3(38) Investment Fiduciaries, we respect your right to privacy, and protecting your privacy is very important to us. We are committed to maintaining the confidentiality, integrity and security of personal information entrusted to us by current and prospective customers. We believe our customers have a right to know how our firm protects and uses private information. We therefore distribute this Privacy Policy to each of our customers at the time an account is opened and annually thereafter, and we hope you will take a moment to review it.

In general terms we collect and use nonpublic personal information in order to conduct a financial services business with our customers, and provide customers with a broad range of products and investment advice. Our customers need to share financial information with us, and may provide other personal information. We hold this nonpublic personal information in the strictest confidence.

### **Collection and Use of Customer Information**

In the course of conducting our financial services business, we collect and use various types of information from various sources depending on the scope of our business relationship. Such sources may include information we receive from you during personal interviews, information we receive from you on applications or other forms, information about your transactions with us or others, and information we receive from non-affiliated third parties, including consumer reporting agencies.

The information we gather is used for internal purposes only. We limit access to your nonpublic personal information to those employees or people who have a specific business reason for knowing, as permitted by law.

### **What Information We Disclose and To Whom**

We do not disclose any nonpublic personal information about you to either affiliated or non-affiliated third parties without your express consent, or as permitted by law for purposes of servicing your financial needs. We may disclose the nonpublic personal information we collect, as described above, to non-affiliated third-parties that perform services on our behalf and to other financial or insurance institutions, in connection with processing your insurance and financial transactions. We may also disclose or report information in circumstances where we believe that disclosure is required or permitted under law, such as to satisfy any legal or regulatory obligations we have. For example, we must give information in response to a valid demand, search warrant or other legally valid inquiry or order. In sharing this information, we insist that any third-party with whom we share information, agrees to maintain the confidentiality of this information in accordance with applicable law.

### **Security Procedures**

We will protect your information with appropriate safeguards and security measures. We restrict access to your personal information to personnel who need that information to provide you with our services. Our employees are familiar with our Privacy Policy and the procedures necessary to safeguard your personal information. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information. We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk, and we back-up our systems as appropriate. We audit our procedures and security measures as necessary, to ensure that they are being properly administered and that they remain effective and appropriate.

### **Contact Us**

Your concerns matter to us. If you have any questions or concerns related to our Privacy Policy and procedures, please feel free to contact us at (818) 296-9529.