

C.L. KING & ASSOCIATES, INC. PRIVACY POLICY STATEMENT

Our Commitment To You

C.L. King is committed to protecting your privacy and maintaining the confidentiality and security of your personal information.

As a C.L. King client, you have entrusted to our care not only your hard-earned money but your personal and financial data as well. We recognize that your relationship with us is based on trust, and that you expect us to act responsibly and in your best interest.

Because your personal and financial data is <u>your private information</u>, we hold ourselves to the highest standards in its safekeeping and use. **This means that we do not sell client information to anyone**.

Instead, your information is used by us primarily to complete transactions that you request, to make you aware of other financial products and services that <u>we</u> offer, provide services to you, to open an account for you, to protect unauthorized persons from accessing your account, or otherwise in furtherance of our business.

The Information We Collect About You

You typically provide personal information when you complete our account application and when you request a transaction that involves C.L. King or one of our affiliated companies. This information may include:

- Name
- Social security or taxpayer identification number
- Assets
- Income
- Account balance
- Investment objectives and activity
- Accounts at other institutions

How We Handle Your Personal Information

We do not sell information about current or former clients or their accounts to third parties. Nor do we share such information, except when needed to complete transactions at your request or to make you aware of related financial products and services that we offer. Here are the details:

- In order to complete certain transactions or account changes that you direct, it may be necessary to provide identifying information to companies or individuals that are not affiliated with us. For example, if you ask to transfer assets from another financial institution to us, we will need to provide certain information about you to that company to complete the transaction.
- In order to alert you to other C.L. King financial products and services that we offer, we may share your information within our affiliated companies.
- In certain instances, we may contract with non-affiliated companies to perform services for us. Where necessary, we will disclose information we have about you to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose.

And, we require these third parties to treat your private information with the same high degree of confidentiality that we do.

In order to service your account and effect your transactions, we may provide your personal information to outside parties such as securities exchanges, market makers, executing or prime brokers, statement vendors, data processing/software providers, and other financial institutions that assist us in servicing your account and have a need for such information. When we disclose such information to service providers and to financial institutions, we require them to protect the confidentiality of your information and to use the information only for the purposes for which we disclose to them.

We do not disclose nonpublic, personal information about our present or former client to third parties other than those described below. It is our policy to allow limited access to your personal, nonpublic information to only those employees and nonaffiliated third parties with business reasons requiring such access. Exceptions to this policy include information being shared for the following reasons:

- As required by law;
- Background checks using a credit bureau or similar reporting agency;
- As required by regulatory or governmental agencies or auditors;
- In the event that we sell or merge all or part of our business; and
- As required by attorneys and accountants

In the event that we change this policy and determine that it is beneficial to share your personal nonpublic information with affiliated or unaffiliated third parties, we will notify you beforehand and give you the opportunity to opt-out of such information sharing.

Finally, we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example, to protect your account from fraud).

How We Safeguard Your Information

We restrict access to nonpublic, personal information about you to internal personnel and affiliates who need to know the information to perform their job responsibilities, to provide products and services to you, and to conduct and process your business in an accurate and efficient manner. We maintain strict physical, electronic and procedural safeguards that comply with federal standards in order to protect your personal information such as storing client files and statements in a secure area and relying on electronic safeguards such as password protection and firewall installation.

What You Can Do

For your protection, we recommend that you <u>do not</u> provide your account information to anyone. If you become aware of any suspicious activity relating to your account, please contact us immediately.

We Will Keep You Informed

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time, but rest assures that if we do change it, we will tell you promptly.