



PRIVACY POLICY

WealthConductor LLC (herein “WC”) is committed to client confidentiality and to protect your privacy. The following information is provided, as required by law, to help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. “Personal information” refers to the nonpublic financial information obtained by WealthConductor in connection with carrying out our services.

Information We Collect

WC collects personal information as part of our relationship with you to provide client services. The type of information we collect may include:

- Information WC receives from you regarding your clients (such as name, address, date of birth, financial circumstance and products they currently own, i.e., investment holdings and insurance policies);
- Information WC receives from you regarding about your clients’ transactions in regard to their IncomeConductor plan, including brokerage statements or other information you authorize WC to receive; and,
- Information you provide WC directly about your personal finances, personal circumstances or other information you authorize WC to receive.

Information Disclosed in Administering Products and Services

WC will not disclose personal information about current or former clients to nonaffiliated third parties except as permitted or required by law. WC does not sell any personal information about you to any third party. WC will not disclose personal information without your authorization, except as required or permitted by law. WC may disclose information it collects about customers or former customers to third parties who are not affiliated with WC under the following circumstances:

- As directed or authorized by the customer;
- To corresponding solicitors as directed by the customer;
- To providers of other services and products used by the customer (custodian, etc.), in order to effect or settle transactions on the customer's behalf,
- As required in a regulatory audit or examination or to respond to a subpoena or similar legal process; and,
- To persons and organizations contracted by WC to provide services in support of our mission to service our customers. These parties include technology vendors, broker dealers/custodians, record-keepers and others. Any party so contracted will be prohibited, in their contract with WC, from disclosing or using client information other than to perform the services contracted for.

Procedures to Protect Confidentiality and Security of Your Personal Information

WC has procedures in place that limit access to personal information to those employees who need to know such information in order to perform business services. In addition, WC maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

Protecting Access to the Private Site

Your login name and password for this Site is unique to you, and may not be shared with any other person. You are responsible for maintaining the confidentiality of your account and password, and you agree to accept responsibility for



all activities that occur under your account or password. You agree to notify us promptly if you become aware of any unauthorized use of your login name and password or unauthorized access to this Site. Always be sure to log out of this Site and close the Web browser window at the end of each session. These safety practices are particularly important if you access this Site from a public computer terminal. We cannot and do not guarantee that this Site will be totally secure.

WC will update its policy and procedures when necessary to ensure that your privacy is maintained and that WC conducts business in a way that fulfills our commitment to you. If WC makes any material changes in its privacy policy, we will make that information available to clients through our Web site and/or other communications. Any questions concerning WC's privacy policy should be directed to the Chief Executive Officer at 860-969-3672.