

PLUNKETT & ASSOCIATES, INC.

Notice of Privacy Policy & Practices

Collection of Customer Information

We collect nonpublic personal information about our customers from the following sources:

- *Account Applications and Other Forms*, which may include a customer's name, address, social security number, and information about a customer's investment goals and risk tolerance levels;
- *Account History*, including information about the transactions and balances in a customer's account; and
- *Correspondence*, written or electronic, between customer and the firm or service providers to the firm.

Disclosure of Customer Information

We may disclose all of the information described above to certain third parties who are not affiliated with the firm under one or more of the following circumstances;

- *As Authorized* - if you request or authorize disclosure of the information
- *As Required by Law* - for example, to cooperate with regulators or law enforcement authorities
- *As Otherwise Permitted by Law* – for example, sharing information with companies that maintain, process or service customer accounts or financial products and services or effect, administer or enforce customer transactions is permitted. Among other activities, we may share information with broker-dealers in order to execute customer trades or with custodians that hold securities on behalf of customers. We believe sharing information for these purposes is essential to providing customers with necessary or useful services with respect to their accounts.
- *Under Joint Agreements* – we may also share information with companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements

Security of Customer Information

We require service providers to the firm;

- to maintain policies and procedures designed to assure only appropriate access to information about customers of the firm;
- to limit the use of information about the firm's customers to the purposes for which the information was disclosed, or as otherwise permitted by law; and
- to maintain physical, electronic and procedural safeguards that comply with federal standards to guard non-public personal information about our customers.

We will adhere to the policies and practices described in this notice regardless of whether you are a current or former client of the firm.