

46 Peaks Investment Advisory Group Customer Information Privacy Principles

At 46 Peaks Investment Advisory Group (46 Peaks), in order to deliver our services as effectively as possible it is essential that we have access to and retain non-public, personal customer information. We are committed to protecting the security and confidentiality of this information and have developed the following Customer Information Privacy Principles.

- **Customer's Expectation of Privacy:** At 46 Peaks, we believe the confidentiality and protection of customer information is a fundamental responsibility. While access to personal information is critical to providing high quality financial services, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for 46 Peaks.
- **Collection, Use, and Retention of Customer Information:** 46 Peaks collects personal information from its clients and prospective clients in a number of manners, including verbally, on applications or other forms, via electronic and hard copy communications, and from your transactions with others or us. 46 Peaks limits the use, collection, and retention of customer information to what is legally required and/or what we believe is useful to conduct our business and provide quality service. Information collected may include but is not limited to: name, address, telephone number, social security number, date of birth, employment status, annual income, and net worth.
- **Employee Access to Information:** At 46 Peaks, it is common and necessary for many of our employees and associated persons to have access to customer information. All employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. All 46 Peaks employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles are subject to disciplinary measures.
- **Protection of Information:** 46 Peaks has established security standards and procedures to provide reasonable protection against unauthorized access to customer information. Customers are strongly encouraged to exercise their own due care when transmitting personal information to us.
- **Sharing of Customer Information:** 46 Peaks shares personal customer information with unaffiliated companies (e.g. – asset managers, custodians, etc.) that assist us in providing our services to our customers, or with regulatory agencies as required by law. 46 Peaks also shares client information with unaffiliated companies to evaluate if a client might benefit from the services of the unaffiliated company. (Federal law allows you to limit 46 Peaks' information sharing for these marketing purposes.) Upon your request and authorization, we will also share your information with other professionals such as your accountants, lawyers, etc. 46 Peaks does not sell or rent client information to others.
- **Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

These Customer Information Privacy Principles apply to prospective, current and former clients and are for general guidance; they do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers. As long as you are a client of 46 Peaks, we will send you a current privacy policy no less than once each calendar year. If you have any questions about this, please contact us at (215) 867-7107.