



KHC Wealth Management Client Privacy Policy

The Firm considers confidential all information concerning its customers including, by way of example, their financial condition, prospects, plans and proposals. The fact that the Firm has been engaged by a company, as well as the details of that engagement, is also confidential. The Firm's reputation is one of its most important assets. The misuse of customer information can damage that reputation as well as customer relationships.

The Firm continually monitors its information sharing practices. The Firm does not share information with third parties, which would require an opt out and, as such, it does not offer its customers the ability to opt out. The Firm's policy allows for sharing of customers' nonpublic personally identifiable information with third parties under the following circumstances:

- Joint marketing relationships – the sharing of customers' nonpublic personally identifiable information would be outlined within a written agreement with the nonaffiliated third party. Customers' nonpublic personally identifiable information would be shared only to the extent that it is necessary to carry out the joint marketing effort. The ability to perform joint marketing falls within Regulation S-P;
- Processing and Servicing Transactions – Regulation S-P allows for the sharing of customers' nonpublic personally identifiable information as necessary to effect, administer, or enforce a transaction a consumer requests or authorizes in connection with: 1) servicing or processing a financial product or service a consumer requests or authorizes, 2) maintaining or servicing a consumer's account with the firm, or 3) a proposed or actual securitization, secondary market sale, or similar transaction related to a transaction of the consumer;
- Other Exceptions – Other Exceptions to Notice and Opt out Requirements – Include the following: With the consent of or at the direction of the consumer,
 - To protect the confidentiality and/or security of the Firm's records,
 - To protect against or prevent actual or potential fraud,





- To resolve consumers disputes or inquiries,
- To persons acting in a fiduciary or representative capacity on behalf of the consumer,
- To provide information to insurance rate advisory organizations, guaranty funds or agencies, agencies that may rate the firm, persons assessing the firm's compliance with industry standards, and the firm's auditors, attorneys, and accountants,
- To the extent allowed under the provisions of law,
- To consumer reporting agencies in accordance with the Fair Credit Reporting Act,
- In connection with a sale, merger, or transfer,
- To comply with Federal, State, or local laws,
- To comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons, and
- To respond to the judicial process or governmental regulatory authorities having jurisdiction over the firm for examination, compliance, or other purposes as authorized by law;
- Fair Credit Reporting Act and Affiliates – The firm does not offer an opt out as required by the Fair Credit Reporting Act for firms that share information with affiliates other than its transaction history with its customers. The firm does not share information with affiliates unless expressly directed to do so by its customers;
- Former Customers – The firm does not share any information concerning its former customers; and
- Consumers – The firm does not share information about consumers who from time to time utilized the firm's services but who are not customers of the firm.

The Firm will provide an initial privacy notice to each client. The Firm will mail its Privacy Notice to all of its customers prior to implementing any changes to its information sharing practices, allowing customers sufficient time to opt out. Any complaints by a customer concerning privacy issues are directed to the Firm's Chief Compliance Officer to research and address.





Additional requirements of Regulation S-P regarding procedures that address administrative, technical, and physical safeguards for the protection of customer records and information are included in our Procedure binder. These procedures include, but are not limited to, the Firm's trading process, the Firm's trade reconciliation process, the Firm's process to value client holdings and assess fees based on those valuations, the Firm's process of safeguarding client assets from conversion or inappropriate use by advisory personnel, and the Firm's Cybersecurity initiatives.

