

## **Obermeyer Asset Management Company Privacy Policy**

On November 12, 1999, President Clinton signed into law financial modernization legislation, entitled the Gramm Leach Biley Act (GLBA). GLBA establishes the first comprehensive federal privacy mandate for all financial institutions. On March 2, 2000 the Securities and Exchange Commission proposed Regulation S-P, which now passed, requires Investment Advisors (as well as other investment companies and broker-dealers) to provide clear and conspicuous notice regarding their privacy policies and practices, to describe to consumers the conditions under which the firm may disclose "nonpublic personal information" to nonaffiliated third parties, to provide a method for consumers to "opt out" of the disclosure of non-public personal information to third parties, to adopt policies and procedures reasonably designed to ensure the confidentiality of customer records and information, to protect against threats or hazards to the security of customer records and information, and to protect against unauthorized access or use of customer records or information that could result in "substantial harm or inconvenience" to any consumer.

**Obermeyer Asset Management Company understands that protecting your financial privacy is just as important as protecting your financial assets.** We are committed to the responsible use of information in order to provide you with the services that you want, to help you achieve your financial goals. This statement of our privacy policy is intended to help you understand the ways in which we gather, use and protect your financial information.

This Privacy Policy describes the way that we treat nonpublic personal information that we may obtain from our customers or from consumers generally.

### **Collection of Nonpublic Personal Information**

We collect information to provide investment management services to you, to protect you from fraud and to make available products and services that may be of interest to you. We collect nonpublic personal information about you from the following sources:

- Information you relay directly to us. This most often is comprised of verbal descriptions of your financial circumstances and goals, as well as investment account statements, tax returns, estate planning documents, and other items you may provide. Additionally, you may direct others, such as your accountant or attorney, to provide information about you to us.
- Information we receive from you through transactions, correspondence and other communications with us; and
- Information we otherwise obtain from you in connection with providing you a financial product or service.

## **Information Sharing with Non-Affiliated Third Parties**

We do not share any nonpublic personal information about our customers or former customers with anyone, unless required by law or permitted by law, directed by you or enumerated below. For example, you may ask us to supply certain information directly to your accountant, attorney or perhaps to your banker. Additionally, we may disclose limited information to companies or organizations that help us maintain and service your account. For instance, we will share limited information with the custodian of your assets if it is required by them to properly service or update your account. In addition, we may share nonpublic personal information to protect against fraud. Finally, we may share limited information with our accountants, auditors or other service providers as required by us to responsibly operate and monitor our business and comply with regulatory requirements.

## **Security**

For your protection, Obermeyer Asset Management Company maintains security standards and procedures that we continually update to safeguard against unauthorized disclosure of information or access to information about you.

We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products and services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

Obermeyer Asset Management Company continuously stresses to its employees the importance of protecting confidential information. All employees of Obermeyer Asset Management Company are required to sign a Non-Disclosure Agreement as a condition of their employment and continued employment with the company.

In securing electronic records, we make extensive use of password protection and our computers reside behind a firewall to protect against unauthorized access. Encrypted backups of client data occur each day and are stored on secure servers at an online location. For further protection, we convert most paper documents to electronic format to protect against fire, flood, vandalism and unauthorized access. All documents containing client identification or non-public personal information that are being discarded are first shredded. Transmission of client data to our primary custodian is encrypted using advanced technology such as 128-bit Secure Sockets Layer 3 (SSL3) encryption.

Email: Obermeyer Asset Management Company uses email to communicate with certain consumers and customers. While we do not share non-public personal information conveyed via email, except as described above, **IT IS POSSIBLE THAT EMAIL TRANSMISSIONS CAN BE READ BY UNAUTHORIZED THIRD PARTIES, INCLUDING INTERNET SERVICE PROVIDERS OR COMPUTER HACKERS.**