

CONSUMER PRIVACY POLICY

The Strategic Investment Counsel Corporation (“Strinco”) is committed to protecting the confidentiality and security of your private investment records and personal information. Our policies and procedures are designed to safeguard your information and to permit only appropriate and authorized access to and use of this information. This privacy policy applies to consumers who are current or former Strinco advisory clients.

Throughout the policy, we refer to information that personally identifies you or your accounts as “personal information”.

1. We do not sell your personal information to anyone.
2. We do not disclose personal information to third parties, unless one of the following limited exceptions applies.
 - We disclose personal information to companies that help us process or service your transactions or accounts(s), including companies that print and mail your account statements.
 - We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, or for institutional risk control.

Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked or permitted us to do so in writing.

3. We do collect personal information in the normal course of business in order to administer your account(s) and serve you better.
 - Application and registration information. We collect information that you provide to us when you open an account. The information we collect may include name, address, phone number, email address, Social Security number, and information about your interests, investments, and investment experience.
 - Transaction Information. Once you have an account with us, to administer your account and better serve you, we collect and maintain personal information about your transactions, including balances, positions, and history, and may include your name or other data in an internal client list that reflects your portfolio and other investment related activities.

4. We protect the confidentiality and security of your personal information.
 - Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service that we have requested.
 - We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information.
 - We maintain physical, electronic and procedural safeguards to guard your personal information.
5. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.
 - If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.
6. We will provide notice of changes in our information-sharing practices.
 - If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

If you have any questions please contact us at any time.