

## Privacy Policy 2018

Castle Wealth Management is an independent registered investment advisory firm that is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Castle Wealth Management. We have never disclosed information to nonaffiliated third parties, except as required by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without first advising you. As you know, we use financial information provided to us by you to help meet your personal financial goals while guarding against any real or perceived infringements on your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transaction on your behalf, or so that our firm can discuss your financial situations with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk. In addition, to ensure the proper disposal of personal information, we shred all applicable documents prior to discarding them.
- The categories of nonpublic personal information that we collect from a client depends upon the scope of the client engagement. It may include information about your personal finances, information about your health to the extent that is needed for the planning process, information about transactions between you and any third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. We also require other firms with whom we deal to restrict the use of your information.

- Personally identifiable information about you will be maintained during the time you are a client and for the required time thereafter that such records are required to be maintained by federal and state securities laws. In general, this is two years on premise, and three years off premise for a total of five years retention. Our off premise storage facility is a large hurricane secure commercial storage facility. The facility has a video monitoring system with the feed recorded offsite for theft deterrence. The facility requires password access to the property and again for the floor of the unit. We have control of our own locks to our unit. After this required period of record retention, all such information will be shredded and disposed. We also have a locked room for our servers and a locked closet for a file cabinet that holds legal documents, for which we retain the sole key.
- We do not include social security numbers on any statements or reports.
- We will be consistent with the applicable Code of Ethics and Professional Responsibility.
- When a CWM computer is left unattended, it employs a screen saver that requires a password to unlock it. This is to ensure the protection of confidential information. Travel laptops and employee cell phones that may have client phone numbers in them are also required to be password protected.
- For instances where clients call to inquire about personal information, we may verify their identity if we do not recognize them by voice. In order to do this, CWM may ask the client certain questions so that CWM can be assured of to whom they are speaking.

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