

Privacy Policy

Stack Financial Management is committed to safeguarding the confidentiality of our clients. We realize that you have entrusted us with your private financial information, and it is our goal to maintain that trust. To ensure your privacy, all personal information provided to our firm is held in the strictest confidence. We have adopted this Privacy Policy so that you will understand what information we collect and how we use it.

Information We Collect. We collect and retain nonpublic personal information about our clients for the following reasons:

- To protect your account and to identify you when we conduct transactions with you or involving your account;
- When the information will help us in managing your account; *and*
- To comply with laws and regulations that apply to us.

We collect this information from the following sources:

- Information we receive from you on applications, other account forms or by communication with you, such as your name, address, date of birth, social security number, net assets, and information about your investments, investment experience and objectives; *and*
- Information about your transactions with us or with others, such as account balance, securities transactions, deposits and withdrawals.

Information We Disclose. We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted or required by law. **We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.**

Affiliated Companies. Stack Financial Management may share basic contact information such as name, address and phone number with its affiliate, InvesTech Research, for the purpose of providing a complimentary subscription and related services. Clients are given the chance to opt out of participating prior to the provision of this service.

Third Parties. In some instances, Stack Financial Management utilizes other companies that provide services necessary to fulfill our management obligations. We may disclose all of the information we collect as described above to these third party companies where we believe in good faith that disclosure is permitted by law. For example, we may share information about you with a brokerage firm in order to accurately maintain your account records or to execute a securities transaction on your behalf.

We also may provide information:

- To obtain bond and insurance coverage as necessary to fulfill our fiduciary responsibilities;
- To obtain special reports and services for our clients (name and address only);
- To companies that provide technical assistance with our software programs;
- To comply with a law, regulation, court order or subpoena;
- To our independent auditors, consultants or attorneys and to agencies that regulate us;
- When you authorize us to release information.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes. We require strict confidentiality in our agreements with them and expect them to keep this information private. Their use of your personal information is limited to the performance of the specific service we have requested.

Confidentiality and Security. We restrict access to nonpublic personal information about you to those employees and agents who need to know that information to provide products or services to you. Physical, electronic and procedural safeguards are maintained that comply with federal standards to guard your nonpublic personal information.

We continually try to maintain complete and accurate information concerning your accounts. If you identify any inaccuracy or need to make a change in your personal information, please contact us so that we may update our records.

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 not do so without first notifying you of any change.

If you have any questions or concerns, please contact us at 1-800-790-5001.