
Privacy Policy for Hepburn Capital Management, LLC

How we Use and Protect Personal Information

At Hepburn Capital Management, LLC, (HCM) we respect your personal financial privacy. We realize that you have entrusted us with private personal financial information, so it is important to us that you know our policy concerning what we do with that information.

Information We May Collect

To advise you in acquiring appropriate financial services and products we may collect personal financial information about you from the following sources:

- Information you provide us in investment advisory agreements, brokerage account applications, and other documents you complete in connection with the opening and maintenance of your accounts with us; and
- Information you provide us orally; and
- Third parties. We may collect identification and contact information, as well as transaction and investment experience information from applications, transactions with others and us, and from outside companies.

Examples of the types of information we may collect include:

- Information about the products and services you purchase through us, including copies of applications, registration forms, or other forms, containing your name, address, telephone number, social security number, e-mail address, investment objectives, income assets, employment information and accounts with others;
- Information regarding your brokerage and/or investment advisory transaction history with us, our service providers, such as clearing firms, or other companies; and
- Information that other companies who assist us in marketing our own products and services or products we offer jointly with other financial institutions may have, such as your name, address, and telephone number.

Information We May Disclose and To Whom We May Disclose It

HCM does not disclose your personal information to companies or organizations not affiliated with us that would use the information we have provided them to contact you about their own products and services. We may disclose all the personal information we collect, as described above, to companies, such as insurance companies and brokers, banks, broker/dealers and investment advisers that provide services to you on our behalf, in the following types of situations. They are:

- Providing administrative, customer assistance, clearing, operational, or other services;
- Preparing, printing and delivering portfolio management performance reports, confirmation statements and other documents;
- Executing securities transactions;
- Maintaining or developing software for us; and
- A financial institution (such as banks, investment advisors or securities firms) with which we have joint marketing arrangements to jointly endorse or offer financial products or services.

Disclosures Permitted By Law

We may also disclose all the information we collect as permitted or required by law. For example, we may disclose information to law enforcement agencies or insurance and securities regulatory agencies.

Instructions on How to Contact Us

For any questions regarding this policy, please contact your Investment Representative directly or call the HCM Compliance Department at (928) 778-4000.

Hepburn Capital Management
2069 Willow Creek Road
Prescott, AZ 86301
www.HepburnCapital.com