

PRIVACY POLICY

HOW WE USE AND PROTECT PERSONAL INFORMATION

Strategic Asset Management is committed to safeguarding the confidential information of its clients. Strategic Asset Management holds all personal information provided by clients in the strictest confidence and it is the objective of Strategic Asset Management to protect the privacy of all clients. Except as permitted or required by law, Strategic Asset Management does not share confidential information about clients with non-affiliated parties. In the event that there were to be a change in this policy, Strategic Asset Management will provide clients with written notice and clients will be provided an opportunity to direct Strategic Asset Management as to whether such disclosure is permissible.

INFORMATION WE MAY COLLECT

To conduct regular business, Strategic Asset Management may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Strategic Asset Management
- Information about the client's transactions implemented by Strategic Asset Management or others
- Information developed as part of financial plans, analyses or investment advisory services

INFORMATION WE MAY DISCLOSE AND TO WHOM WE MAY DISCLOSE INFORMATION

To administer, manage, service and provide related services for client accounts, it is necessary for Strategic Asset Management to provide access to customer information within the firm and to non-affiliated companies, (Strategic Risk Management, Strategic Tax and Retirement, Star Capital, Orion. Etc.), with whom Strategic Asset Management has entered into agreements. To provide the utmost service, Strategic Asset Management may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Strategic Asset Management's behalf.

- Information Strategic Asset Management receives from the client on applications (name, Social Security number, address, assets, etc.)
- Information about the client's transactions with Strategic Asset Management or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Strategic Asset Management Since Strategic Asset Management shares non-public information solely to service client accounts, Strategic Asset Management does not disclose any non-public personal information about Strategic Asset Management's customers or former customers to anyone, except as permitted by law. However, Strategic Asset Management may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Strategic Asset Management has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Strategic Asset Management will allow its clients the opportunity to opt out of such disclosure.

SECURING YOUR INFORMATION

Our staff, affiliates, advisors and their staff are required to follow our policies and procedures to keep your information secure, confidential and prevent unauthorized use of your private information. Protecting your privacy is critically important to Strategic Asset Management.

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