

## PRIVACY POLICY

### **Our Commitment to You**

Peter Elish Investments Securities ("PE Securities") is committed to safeguarding the use of your personal information that we obtain as your Investment Advisor. PE Securities (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we obtain and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. We do not sell your non-public personal information to anyone and we do not provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### **The Information We Collect About You**

You typically provide personal information when you complete the paperwork required to become our Client. This information may include the following:

- Name and addresses
- Assets, income and other related financial data
- E-mail addresses
- Phone numbers
- Account balances
- Social security or taxpayer identification numbers and date of birth
- Investment activity
- Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements and Managed Account Agreements;
- Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires; and
- Information about your transactions with us or others.

## **Information About You That PE Securities Shares**

PE Securities works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

In addition, your non-public personal information may also be disclosed to persons we believe to be your authorized agent or representative, regulators in order to satisfy PE Securities' regulatory obligations, and as otherwise required or permitted by law.

We may disclose your non-public personal information to companies we hire to help administrate and service our business. Companies we hire to provide services of this kind 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 we have requested.

We may disclose non-public personal information about you in connection with the transfer of your account to another financial institution at your request or the request of your Advisor.

PE Securities permits Advisors that terminate their affiliation with our firm to make copies of their client files. If you do not want PE Securities to disclose your non-public personal information with your advisor's new financial institution, please send a written request to the attention of Compliance at [compliance@elish.com](mailto:compliance@elish.com)

To repeat, we do not sell your non-public personal information to anyone.

## **Information About Former Clients**

PE Securities does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

## **Confidentiality and Security**

PE Securities treats Information in a confidential manner. Our employees are required to protect the confidentiality of Information maintained by the Firm. Employees may access Information only when there is an appropriate reason to do so, such as to administer or offer our products and services. PE Securities strives to ensure that our systems are secure and that they meet industry standards. Our commitment to data security involves monitoring new advances in security technology and enhancing our security architecture to ensure that we provide a high level of privacy for investment services firms and their customers. Where appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers), and access control mechanisms to control access to systems and data. Third parties who may have access to such personal Information must also agree to follow appropriate standards of security and confidentiality.

## **Protection of Your Information**

You can help safeguard your personal Information by taking a few simple precautions, which include but are not limited to:

- Do not disclose your account Information, personal identification numbers, passwords or code words to others;
- Never provide confidential Information to unknown callers;

- When utilizing the internet, be sure to use a secure browser and exit online applications as soon as you finish using them; and
- Ensure your personal computer has virus and malware protection software and never open email from unknown sources.
- Always maintain your computer and other devices used to access the internet, including updating Windows and other software applications.
- Do not use an unsecure wireless connection to the internet in public places.

### **We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy and will provide you with a revised Privacy Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current Privacy Policy by contacting us at (214) 385-2801 or [info@elish.com](mailto:info@elish.com).