

## Privacy Practices & Principles

Protecting your privacy is very important to us at **Elm3 Financial Group, LLC (Elm3)**. We recognize that the privacy of personal information is important to our clients.

We want to assure all of our clients that whenever information is used, it is done with discretion. The safeguarding of client information is an issue we take seriously at Elm3. This privacy policy explains the types of information we may collect from you, and informs you how we may use or disclose that information.

**Recognition of a Client's Expectation of Privacy:** At Elm3, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for Elm3.

This policy applies to personal information we collect when we provide financial products and services to clients and former clients of Elm3 Financial Group, LLC. This policy applies whether you are a current or former client.

**Use, Collection, and Retention of Client Information:** Elm3 limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients.

**Maintenance of Accurate Information:** Elm3 recognizes that it must maintain accurate client records. Therefore, Elm3 has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.

**Limiting Employee Access to Information:** At Elm3, employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Elm3 employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.

**Protection of Information via Established Security Procedures:** Elm3 maintains physical, electronic, and administrative policies and procedures designed to restrict access to your personal information. These include programs and specifications for physical security and records retention and disposal; password protection; data management practices; and other measures to restrict access to the data we hold in physical and electronic forms.

**Restrictions on the Disclosure of Client Information:** We share the minimum amount of information necessary for the company to offer its product or service. We may also share information with non-affiliated companies that assist us in providing our products and services to our clients; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a client.

- **We do not share your personal information with non-affiliated third parties** for marketing purposes except as permitted by applicable law or with your consent. We do not sell or rent your personal information to third party direct marketers.

- **Maintaining Client Privacy in Business Relationships with Third Parties:** Where permitted by applicable law, we may disclose your personal information to service providers who perform business functions on our behalf (for services such as custodial services and direct mail production). We require our service providers to have written policies that specify appropriate use of your personal information, require them to safeguard your personal information, and prohibit them from making unauthorized or unlawful use of your personal information.

- **Required by law:** We may disclose your personal information to affiliates or non-affiliated third parties (including government agencies) when we have a good faith belief that such disclosure is required or permitted by law. This may occur in connection with a court order, legal process, or other judicial administrative, or investigative proceeding.

**Elm3 Financial Group, LLC** recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should call Stacey A. Nickens at 678-297-9500. We reserve the right to change the privacy policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.