

Privacy Notice to Our Customers

At **Case Pearlman Retirement Plan Advisors, LLC**, protecting our clients' privacy is paramount. We recognize that plan information is extremely private and sensitive in nature. Our commitment is to maintain strict standards to safeguard your plan's financial information at all times while bringing you valuable products and services.

This information is being provided to you as required by Regulation S-P, which was adopted by the Securities and Exchange Commission to modernize the laws governing the financial services industry.

Information We Collect and Share

The financial information we collect directly from the plan includes information required to communicate with you and to help us advise the plan. We also use it to help us comply with the legal and regulatory requirements imposed by federal and state regulations.

Some of the financial information we may collect and share includes, but is not limited to:

- Participant information received on applications and other forms, such as names, mailing addresses, telephone numbers, e-mail addresses, fax numbers, and Social Security numbers.
- Information about participant financial transactions with us, our affiliates, or others, such as account balances, securities trading activity, fund transfers, and checking transactions.
- Information as required by law to ascertain participant experience in margin use and trading, such as approximate annual income and net worth.
- Information we may obtain about participants from a consumer reporting agency, such as creditworthiness and credit history.

In all cases, we collect and share only personal financial information that is either required by law or necessary to provide personalized financial services to participants.

Our Use of Your Personal Financial Information

In the course of conducting investment advisory services on behalf of participants, there are occasions where we may engage affiliated and/or nonaffiliated companies to (i) service or process a financial product or service requested by them or, (ii) to maintain or service their accounts. These companies may be engaged in a related business such as mutual funds, annuities or other insurance product, consumer banking, mortgage lending, securities brokerage, investment advisory or tax, estate or financial planning. Or

they may be engaged in some service such as a transfer agent, clearing or custodial firm, accounting or reporting, systems operation or marketing. In such cases, the personal financial information we may share about participants with these companies is necessary and permissible by law to administer, process, service, and enforce a transaction that they requested or authorized.

We may also share some or all of a participant's personal financial information with his legal representative, trustee or other fiduciary, or where we need to protect the confidentiality and security of our records, or to prevent potential or actual fraud unauthorized transactions, claims or other liability, for institutional risk control or resolving customer disputes or inquiries.

Also, as permissible by law, we may provide participants' personal financial information on request, for example, to insurance rate advisory organizations; funds guaranty agencies; agencies rating our compliance with industry standards; and our attorneys, accountants and auditors. In addition, subject to the Right to Financial Privacy Act, sharing of their personal financial information is permitted on request by a law enforcement agency, regulator, self-regulatory agency or in a public safety investigation. Such sharing of their personal financial information is also permitted on request by a consumer reporting agency in accordance with the Fair Credit Reporting Act, or to comply with federal, state or local laws, rules or regulations, including requirements of self-regulatory organizations or a subpoena or judicial process.

Outside of the exceptions mentioned above and as permitted by law, we will not share participants' personal financial information with anyone, unless they specifically ask us in writing to do so.

Confidentiality and Security

When we share participants' personal financial information with affiliated and/or nonaffiliated companies, they are not allowed to use their personal financial information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of their personal financial information to the performance of the specific service we have requested.

We restrict access to their personal financial information to employees who need to know such information in providing products or services. We maintain physical, electronic, and procedural safeguards that comply with applicable federal regulations to guard personal financial information. Of course, even with these safeguards, we cannot guarantee that personal financial information will always be safe from unauthorized sharing, and we assume no responsibility or liability in that event, except as and to the extent that may be imposed by law.

Miscellaneous

- We reserve the right to change this Privacy Notice at any time. In that event, we will inform the plan of any material changes as required by law.
- If the plan decides to sever our relationship or become an inactive customer, we will adhere to the privacy policies and practices described in this notice.

- Please keep this Privacy Notice for your records.
- This Privacy Notice has been established and is given in accordance with applicable federal law. It is not intended and in no event shall it be deemed to constitute an offer or agreement of any kind on our part or to impose any duty or obligation of any kind upon us except as and to the extent expressly required by law.