

Pinnacle Investment Advisors/ NAFA Privacy Policy

Updated: November 25, 2019

Our Commitment to Your Privacy

Please contact us by e-mail or telephone if you have any questions or concerns or would like to set up an appointment to meet with one of our staff experts.

Our Commitment to Your Privacy

Protecting our clients' privacy is of paramount importance to Pinnacle Investment Advisors/NAFA ("Advisor"). It is our policy that no private client financial information obtained by us is sold or made available to third parties except that:

- Third parties may be used by Advisor to assist in the management or maintenance of client accounts (such as a client's custodian);
- Client information may be released to client's tax preparer, legal and other third party representatives at client's direction;
- Client information may be released in accordance with applicable laws and regulations.

We will not share nonpublic personal information about our clients with nonaffiliated third parties without prior client consent, except for specific purposes described below. This notice explains our collection, use and safeguarding of client information.

How We Gather Information

In connection with providing clients with investment management services, we may obtain information about them from the following sources:

- Client agreements and other information that clients provide to us, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client's name, address, phone number, email address, social security number, employment information, income, investment experience, and credit references;
- Personal tax returns provided by the client;
- Transactions on a client's behalf. This information may include the client's account balances, positions, investment interests and history; and
- Public sources.

Sharing Information with Nonaffiliated Third Parties

We only disclose non-public client information to nonaffiliated third parties without prior client consent when we believe it necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;

- To perform services for the firm or on its behalf to develop or maintain proprietary trading or other software;
- To help us prevent fraud;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- To comply with federal, state or local laws, rules and other applicable legal requirements; and

We do not make any disclosure of client nonpublic personal information to other companies who may want to sell their products or services to you. For example, we do not sell client lists, and we will not sell client names to catalogue companies.

Former Clients

Our Privacy Policy continues to apply to all former clients.

To Whom This Policy Applies

This Privacy Policy applies to individuals who obtain or have obtained services from Pinnacle Investment Advisors or NAFA used primarily for personal, family or household purposes.

Our Security Practices and Information Accuracy

We take steps to safeguard client information. We restrict access to the personal and account information of our clients to our employees and agents for business purposes only. We maintain physical, electronic and procedural safeguards to guard your personal information.

Additionally, we have internal controls to keep client information as accurate and complete as we can. If you believe that any information about you is not accurate, please let us know.

Other Information

We reserve the right to change this Statement of Privacy Policy. The examples contained within this Privacy Policy are illustrations, and they are not intended to be exclusive. If you have any questions about our Privacy Policy, please contact David Poarch, Managing Partner.