



## **PRIVACY POLICY**

### **Introduction**

As a registered investment adviser, McDonough Capital Management, Inc. (MCM) must comply with SEC Regulation S-P, which requires registered advisers to adopt policies and procedures to protect the "nonpublic personal information" customers and to disclose to such persons policies and procedures for protecting that information. Nonpublic personal information includes nonpublic "personally identifiable financial information" plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by MCM to clients, and data or analyses derived from such nonpublic personal information. In addition, the obligation for investment advisors such as McDonough Capital Management, Inc. to maintain the absolute privacy of their clients and their clients information is addressed in the Gramm-Leach-Bliley Act Privacy Safeguards Rule, 16 CFR Part 314. In November 1999, Congress passed landmark legislation repealing Depression-era restrictions on cross-ownership between banks, insurance companies, and broker-dealers. Included in the Gramm-Leach-Bliley Act (the GLBA) was a separate chapter restricting the sharing of consumer information collected by financial institutions with third-party firms or vendors. Nearly all firms involved in the financial services industry are subject to the federal regulations, and many will be subject to future state privacy statutes and regulations. Federal privacy regulations issued pursuant to Title V of the GLBA became effective November 13, 2000, and require financial institutions to create a comprehensive privacy policy and send privacy notices annually to customers.

### **Overview**

This Privacy Policy covers the practices of McDonough Capital Management, Inc. and applies to all nonpublic personally identifiable information of our current and former customers. MCM views protecting its customers' private information as a top priority and, pursuant to the requirements of the federal Gramm- Leach-Bliley Act, MCM has instituted policies and procedures to ensure that customer information is kept private and secure.

MCM and its employees does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client's account, MCM may share necessary information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and consultants, and attorneys. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

MCM restricts internal access to nonpublic personal information about the client to those associated persons of MCM who need access to that information in order to provide services to the client. As emphasized above, it has always been and will always be MCM's policy never to sell information about current or former customers or their accounts to anyone. It is also MCM's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

### **Safeguarding of Client Records and Information**

McDonough Capital Management, Inc. has implemented internal controls and procedures designed to maintain accurate records concerning customers' personal information. MCM's customers have the right to contact MCM if they believe that Company records contain inaccurate, incomplete, or stale information about them. MCM will respond in a timely manner to requests to correct information. To protect this information, MCM maintains appropriate security measures for its computer and information systems, including the use of passwords and firewalls.

Additionally, MCM will use shredding machines, locks and other appropriate physical security measure to safeguard client information stored in paper format. For example, employees are expected to secure client information in locked cabinets when the office is closed.

MCM protects confidential client information including but not limited to consumer report or any compilation of consumer report information derived from a consumer report by maintaining some information in locked filing cabinets and shredding such information when then information is no longer needed by MCM.

### **Security of Client Information**

MCM maintains physical, electronic, and procedural safeguards to protect the integrity and confidentiality of customer information. Internally, MCM limits access to customers' nonpublic personal information to those employees who need to know such information in order to provide products and services to customers. All employees are trained to understand and comply with these information principles.

### **Privacy Notice**

MCM has developed a Privacy Notice, as required under Regulation S-P, to be delivered to customers initially and on an annual basis. The notice discloses MCM's information collection and sharing practices and other required information and has been formatted and drafted to be clear and conspicuous. The notice will be revised as necessary any time information practices change.

### **Privacy Notice Delivery**

- 1. Initial Privacy Notice** - As regulations require, all new customers receive an initial Privacy Notice at the time when the customer relationship is established, for example on execution of the agreement for services.
- 2. Annual Privacy Notice** - The GLBA regulations require that disclosure of the Privacy Policy be made on an annual basis. MCM will deliver its annual Privacy Notice in conjunction with the annual offer of its Form ADV Part II.

### **B. Revised Privacy Notice**

Regulation S-P requires that MCM amend its Privacy Policy and distribute a revised disclosure to customers if there is a change in MCM's collection, sharing, or security practices.