

Financial Design & Management's 2016 Privacy Statement

FD&M, Inc. highly values you as a client and respects your right to privacy. Protecting your privacy and safeguarding your personal and financial information is one of our top priorities. That is why we want you to understand what we do to protect your privacy when we collect and use information about you and the steps that we take to safeguard your personal information.

We Pledge To You That:

- Protection of your personal information is a top priority;
- Your account information and all documents you provide to us are protected in a secure environment;
- We only collect personal information in order to accomplish our commitments to you;
- Information about you is only used and shared in limited and controlled ways.

Information We Collect:

In connection with providing financial advice, setting up custodial accounts and other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications;
- Information about your transactions with others, including your investment advisory representative or us; and
- Information received from credit or service bureaus or other third parties.

Categories of Information We Disclose:

We may disclose information to entities that perform administrative services on our behalf or as required or permitted by law for legal, regulatory or other purposes. However, Financial Design & Management, Inc. and its affiliates do not sell customer lists and will never sell your name to anyone for unrelated business purposes.

Information We Disclose:

We will not disclose information regarding you or your account with us, except under the following circumstances:

- To your authorized financial advisor or Investment Advisory Representative and his or her compliance supervisor. Financial Design & Management Inc. permits Investment Adviser Representatives that terminate their affiliation with Financial Design & Management, Inc. to make copies of your client files so that he or she can continue to serve you at their new firm unless you object in writing to FD&M;
- To our broker/dealer, Gēneos Wealth Management, Inc or their affiliates, to the extent permitted by law. We do not sell or maintain lists with any outside nonaffiliated marketing firms;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker or insurance company providing services to you and/or Financial Design & Management, Inc.;
- To third parties whom you request in writing.
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors;
- To third parties who perform services or marketing on our behalf;
- To consumer reporting agencies;
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to ensure compliance with regulatory inquiries.
- To firms that are or may be potential merger or acquisition partners as part of a succession or business continuation plan.

How We Use Information:

Information may be used by us and those firms that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer or custodian providing services to you and/or Financial Design & Management, Inc.;
- To service your accounts, such as by issuing checks and account statements;
- To comply with Federal, State, and Self-Regulatory Organization requirements;

- To protect your accounts from unauthorized access or identity theft;
- To keep you informed about financial services of interest to you.
- To insure smooth functioning as a result of a natural disaster (business continuation) or business sale (succession planning)

Our Security Policy:

Only those individuals who need access to your confidential client information to perform their jobs are authorized access your information. Investment Advisory Representatives and employees who have access to your information may only use it for legitimate business purposes. We maintain physical, electronic, and procedural safeguards and security measures so that the personal information we have about you is treated responsibly and in accordance with our privacy policy and that our policy complies with applicable state and federal regulations.

Closed or Inactive Accounts:

If you decide to close your account(s) or become an inactive client, we will adhere to the privacy policies and practices as described in this notice. **If you wish to opt out of having your Investment Advisory Representative copy your personal information upon leaving FD&M, Inc., please send your written request to the address below.**

Complaint Notification:

Please direct complaints to: Financial Design & Management, Inc. 4645 Ziegler Road, Suite 220 Fort Collins, CO 80528
Attn: Mark L. Kornblau 970-490-2033.

Changes to This Privacy Policy:

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please write to us at Financial Design & Management, Inc. 4645 Ziegler Road, Suite 220 Fort Collins, CO 80528.

Proxy Statement:

The Company shall vote proxies related to securities held by any client in a manner solely in the interest of the client. The Company shall consider only those factors that relate to the client's investment, including how its vote will economically impact and affect the value of the client's investment. Proxy votes generally will be cast in favor of proposals that maintain or strengthen the shared interests of shareholders and management, increase shareholder value, maintain or increase shareholder influence over the issuer's board of directors and management, and maintain or increase the rights of shareholders; proxy votes generally will be cast against proposals having the opposite effect.

Financial Design & Management, Inc. offers you the opportunity to view proxy voting policy and procedures and proxy voting records during scheduled appointments. Additionally, if you would like a copy of our proxy voting policy and procedures or proxy voting history at any other time, you may request this information by calling 970-490-2033 or by email at jodyr@financialdesign.us.