

JOEL SMITH & ASSOCIATES, LLC

Privacy Policy

In order to provide a high level of customer service, Joel Smith & Associates, LLC requires that you provide current and accurate financial and personal information. Information may also be collected to fulfill legal and regulatory requirements. The information requested from clients may vary depending on the scope of the engagement. Joel Smith & Associates, LLC respects clients and will protect the information provided in a manner that is safe, secure and professional. Joel Smith & Associates, LLC and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

Only those with approval may access the client files.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal.

Sharing Nonpublic Personal and Financial Information

Joel Smith & Associates, LLC is committed to the protection and privacy of its clients' personal and financial information. Joel Smith & Associates, LLC will not share such information with any nonaffiliated third party except:

- When necessary to complete a transaction in the account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes;
- When requested by a fiduciary or beneficiary on the account;
- To rating agencies, or to the client's attorneys or accountants;
- When required by a regulatory agency, or for other reasons required or permitted by law;
- In connection with a sale or merger of Joel Smith & Associates, LLC's business; or
- In any circumstances with the customer's instruction or consent.

Opt-Out Provisions

It is not a policy of Joel Smith & Associates, LLC to share nonpublic personal and financial information with unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.

This policy may be changed or updated as needed and to comply with regulations. Joel Smith & Associates, LLC will provide notice of the privacy policy annually to clients that maintain accounts with us. The Privacy Policy is available on the website at www.JoelSmithLLC.com and where such documents may be required to be available.