

# CUSTOMER PRIVACY NOTICE

We recognize the importance of protecting our clients' privacy. IRUS Advisory restricts access to your personal and account information to provide products or services to you. IRUS maintains physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information. The following is designed to help you understand what information we collect from you and how we use that information to serve your account.

## **Why do we collect information about individuals?**

The collection and use of information about individuals is fundamental to our ability to provide and administer our financial services. In order to conduct business, we collect and use information for such purposes as developing written financial plans and recommendations.

## **How do we safeguard information?**

We authorize access to an individual's information only to those who have a legitimate need to know in order to provide our services, or as required by law. Employees who have access to information about an individual are required to follow company procedures designed to keep that information secure and confidential. We maintain physical, electronic and procedural safeguards to protect information about individuals.

## **What information do we collect about individuals?**

We may collect information about individuals, as described below, from the following sources:

- **Information from individuals**

Most information we collect is obtained directly from an individual or that individual's representative. For example, we may collect an individual's name, address, date of birth, Social Security Number and certain financial information.

- **Information from third parties**

If we need to verify information or need additional information, we may obtain information from third parties, such as accountants and attorneys.

Information collected from the individual and from third parties may vary depending on the type of service applied for by the individual.

**What information do we share with other Irus Advisory affiliates?**

We may disclose the information described above to our affiliates in order to conduct business, such as providing services, account maintenance or information about other Irus affiliates products or services. Our affiliates may include the following categories of companies:

- Financial services companies (for example life insurers, securities firms, broker dealers and financial advisors)
- Non-financial services companies (for example companies that perform marketing of our products and services.

**What information do we share in other circumstances?**

We may disclose the information described above as necessary to conduct business or where disclosure is required by law. For example, we may share information with the following categories of nonaffiliated third parties:

- Third parties that administer and support our products and services (for example, underwriters, printing companies, system vendors and companies that assist with processing data)
- Financial services companies (for example, other investment managers and advisory firms, insurance companies, broker dealers, mutual fund companies, insurance agents, general agents and reinsurers)
- Third parties that conduct audit or research services
- Law enforcement and regulatory agencies (for example, to help us prevent fraud or as may be required by law)

Irus Advisory Corporation does not make any disclosures of customer information to nonaffiliated companies who intend to sell their products to our customers. For example, we will not sell customers' names and addresses to a catalog company.

We will treat and safeguard information about individuals who terminate their contracts with us as described above in this notice.