



<b>Facts</b>	<b>What Does Clelland &amp; Company Do With Your Personal Information?</b>
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Account balances and transaction history</li> <li>• Checking account information</li> <li>• Investment experience and assets</li> </ul> When you are no longer a client, we will continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Clelland & Company chooses to share; and whether you can limit the sharing.

Reasons we can share your personal information	Does Clelland Share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations	YES	NO
<b>For our marketing purposes –</b> to offer our products and services to you	NO	We Do Not Share
<b>For joint marketing with other financial companies</b>	NO	We Do Not Share
<b>For our affiliates' everyday business purposes –</b> Information about your transactions and experience	NO	We Do Not Share
<b>For our affiliates' everyday business purposes –</b> Information about your credit worthiness	NO	We Do Not Share
<b>For our affiliates to market to you</b>	NO	We Do Not Share
<b>For non-affiliates to market to you</b>	NO	We Do Not Share

Questions?	Call (858) 587-8700 or (800) 430-6912 or go to <a href="http://www.clelland.com">www.clelland.com</a>
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Who is providing this notice?	Clelland & Company, Inc.
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What we do	
How does Clelland & Company protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Clelland & Company takes seriously the obligation to safeguard our clients' non-public personal information.
How does Clelland & Company collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• Open an account or enter into an investment advisory contract</li> <li>• Make deposits or withdrawals from your account</li> <li>• Seek advice about your investments</li> </ul> We also may collect your personal information from other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.

Definitions	
Affiliate	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Clelland &amp; Company does not have affiliates</li> </ul>
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Clelland &amp; Company does not share with non-affiliates so they can market to you.</li> </ul>
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• Clelland &amp; Company does not jointly market</li> </ul>