

Horizon Advisory Services, Inc.

Client Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our clients are confident that we will manage their financial affairs expertly and confidentially.

At Horizon Advisory Services, our clients have access to a broad range of products and services. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain client information.

We want to assure all of our clients that whenever their personal information is used, it is done with discretion. The safeguarding of client information is an issue we take seriously at Horizon Advisory Services. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles that guide us in serving the privacy needs of our clients:

1. **Recognition of a Client's Expectation of Privacy:** At Horizon Advisory Services, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for Horizon Advisory Services.
2. **Use, Collection, and Retention of Client Information:** Horizon Advisory Services limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth.
3. **Maintenance of Accurate Information:** Horizon Advisory Services recognizes that it must maintain accurate client records. Therefore, we have established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
4. **Limiting Employee Access to Information:** At Horizon Advisory Services, employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Horizon Advisory Services employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.
5. **Protection of Information via Established Security Procedures:** Horizon Advisory Services recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to client information.
6. **Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Horizon Advisory Services places strict limits on who receives specific information about client accounts and other personally identifiable data. Horizon Advisory Services may share information with such companies if they provide a product or service that may benefit our

clients. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our clients.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our clients; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a client.

7. **Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
8. **Disclosure of Privacy Principles to Clients:** Horizon Advisory Services recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their information should call Michael Congdon, our Chief Compliance Officer at (585) 334-3600 or e-mail him at mrcongdon@horizonadvisors.net.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.

In its capacity as investment advisor, Horizon Advisory Services may disclose personal financial information regarding its clients to affiliated third parties as deemed necessary by Horizon Advisory Services to fulfilling its obligations and responsibilities as the client's investment advisor. Clients wishing to opt out of such informational disclosure may do so by notifying Horizon Advisory Services in writing of their opt-out instructions. Horizon Advisory Services will not at any time share confidential client information with unaffiliated entities not directly engaged in fulfilling our Firm's investment advisory responsibilities to our clients.

Michael R. Congdon
Chief Compliance Officer
Horizon Advisory Services, Inc.