



Neumann Capital Management, LLC

Investment Management & Financial Planning

Your Privacy Is Important To Us

June 2017

At Neumann Capital, 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 manage and maintain certain client information.

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

To affirm our continued commitment to the proper use of client information and protecting your privacy, we have set forth the following privacy policies.

Categories Of Information We Collect

We collect nonpublic personal information about you from the following sources: information we receive from you on applications, client questionnaires and other forms; information about your investment transactions from financial service institutions, accountants, lawyers, mortgage brokers and others.

Disclosure Of Information

We do not disclose nonpublic personal information to nonaffiliated third parties (such as brokerage firms or insurance companies) except as permitted by law or in carrying out the duties for which you retained us. It is our policy to contact you prior to the release of any nonpublic private information to nonaffiliated third parties and to provide you with the option to opt out.

Disclosure of any nonpublic personal information about our former clients is handled in the same manner as for our current clients.

USE OF THIRD PARTY TRADE DATA MANAGEMENT SERVICES: We are aided in our ongoing portfolio management and client account monitoring services by the use of third party portfolio and trade data management software and services provided by Charles Schwab & Co., Inc. and Envestnet-Tamarac. Such third party services provide linked access to client custodial accounts and trade activity and provide “cloud” storage of such data on their secure, internal computer servers on our behalf. We only share nonpublic client information with nonaffiliated third parties when we believe it necessary for our provision of services to you or to maintain your account

IMPORTANT: We use the services of Chicago Clearing Corporation (CCC) to process class action securities litigation claims on behalf of our clients. We provide CCC with some account-holder information and details of securities holdings and transaction history so that they can

perform this service, which relieves clients of the need to sign and submit paperwork to participate in class action suits. For providing these services, CCC charges a fee of 20% of the funds that they recover. *If you would prefer NOT to participate in this service, please contact us to opt out.*

Disclosure Of Client Information And Protecting Your Confidentiality

We limit access to nonpublic personal information to only those employees who have a business or professional reason for knowing it and only to nonaffiliated third parties as permitted by law. For example, federal regulations permit us to share a limited amount of information with brokerage firms in order to transact business on your behalf and federal and state regulators, in the course of inspecting us, may also have access to your data. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

If we provide personal identifiable client information to a third party with which we have a business relationship, we will have the third party execute a signed non-disclosure agreement and/or otherwise ensure that they will keep such information confidential, consistent with the conduct of our business relationship.

We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. Disclosure of private client information is an offense subjecting employees to disciplinary action, probation and/or termination.

We will maintain your files and data for at least the period of time required by law. After this required retention period, we have the right to destroy all such information. If destroyed, it will be destroyed appropriately. This includes both paper and electronic records.

Our Commitment

We want to assure you that we are committed to maintaining the confidentiality, integrity and security of your personal information. The safeguarding of client information is an issue we take seriously; whenever information is used, it is done with discretion.

We have developed these privacy policies to protect our clients. These policies are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreement we have with our clients.

We want our clients to understand our commitment to their privacy and our use of client information. If you have any further questions please feel free to call us at 650.548.9200.