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PRIVACY POLICY

This policy provides information about the privacy practices of Pollock Investment Advisors, LLC. If you have any questions about the contents of this policy, please contact James K. Pollock, CFA at (734) 929-2520 and/or at jim@pollockinvestmentadvisors.com. This policy has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Pollock Investment Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Pollock Investment Advisors, LLC is 153350.

Pollock Investment Advisors, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

March 1, 2020

Background

As a registered investment advisor, Pollock Investment Advisors, LLC must comply with federal Regulation S-P (or other applicable regulations), which requires registered advisors to adopt policies and procedures to protect the “nonpublic personal information” of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information.

Nonpublic personal information includes nonpublic “personally identifiable financial information” plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by Pollock Investment Advisors, LLC to clients, and data or analyses derived from such nonpublic personal information.

The purpose of these privacy policies and procedures is to provide administrative, technical and physical safeguards, which assist employees in maintaining the confidentiality of nonpublic personal information collected from the consumers and customers of an investment advisor. All nonpublic information, whether relating to an advisor's current or former clients, is subject to these privacy policies and procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

Responsibility

James K. Pollock, as Chief Compliance Officer (CCO), is responsible for reviewing, maintaining and enforcing these policies and procedures to ensure meeting Pollock Investment Advisors, LLC's client privacy goals and objectives while at a minimum ensuring compliance with applicable federal and state laws and regulations. Pollock is also responsible for distributing these policies and procedures to employees and conducting appropriate employee training to ensure employee adherence to these policies and procedures.

Policy and Procedures

Pollock Investment Advisors, LLC has adopted the privacy policy attached hereto and the CCO reviews to monitor and insure the firm's adherence to such policy.

PIA has adopted the privacy policy (attached) and the CCO reviews to monitor and insure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which include the following:

Non-Disclosure of Client Information

PIA does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:

- As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over PIA or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

Employees are prohibited, either during or after termination of their employment, from disclosing client information to any person or entity outside PIA including family members, except under the circumstances described above. An employee is permitted to disclose personal information only to other employees who need to have access to this information to provide services to the client.

Security of Client Information

PIA restricts access to personal information to those employees who need to know such information to provide services to our clients. Any client information is secured in a locked file cabinet after business hours. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving personal information must be conducted by employees in a manner that protects the information from being overheard.

Privacy Notices

PIA provides to client the privacy policy notice at the time the client signs the advisory agreement and acknowledges receipt of the privacy policy. PIA will also mail to each client, on an annual basis, a notice of the firm's current privacy policy.

If PIA adopts changes to its privacy policy, the firm shall provide each such client with a revised notice reflecting the new policy.



PRIVACY NOTICE (REGULATION S-P)

Pursuant to Regulation S-P adopted by the Securities and Exchange Commission, it is the policy of Pollock Investment Advisors, LLC to keep confidential nonpublic personal information ("*information*") pertaining to each current and former client (i.e., *information* and records pertaining to personal background, investment objectives, financial situation, investment holdings, account numbers, account balances, etc.) unless Pollock Investment Advisors, LLC is (1) previously authorized by the client to disclose *information* to individuals and/or entities not affiliated with Pollock Investment Advisors, LLC, including, but not limited to the client's other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment advisor account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) permitted to do so in accordance with the parameters of regulation S-P.

The disclosure of *information* contained in any document completed by the client for processing and/or transmittal by Pollock Investment Advisors, LLC in order to facilitate the commencement/ continuation/ termination of a business relationship between the client and nonaffiliated third party service provider (i.e. broker-dealer, investment adviser, account custodian, insurance company, etc.), including *information* contained in any document completed and/or executed by the client for Pollock Investment Advisors, LLC (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Each individual and/or entity affiliated with Pollock Investment Advisors, LLC is aware of Pollock Investment Advisors, LLC's privacy *policy*, and has acknowledged his/her/its requirement to comply with same. In accordance with the Pollock Investment Advisors, LLC privacy *policy*, each such affiliated individual and/or entity shall have access to *information* to the extent reasonably necessary for Pollock Investment Advisors, LLC to perform its services for the client, and to comply with applicable regulatory procedures and requirements.