

# BRAEBURN WEALTH MANAGEMENT, INC.

## PRIVACY POLICY

2018

Braeburn Wealth Management, as a Registered Investment Advisory Firm, is covered under the definition of a “financial institution” under the Gramm-Leach-Bliley Act (the “Act”). The Adviser is therefore subject to Act as well as the rules of privacy imposed on financial professionals by the United States Securities and Exchange Commission’s (“SEC”) Privacy Rule (“Regulation S-P”).

To maintain compliance, every broker, dealer, investment company and registered investment adviser is required to adopt policies and procedures reasonably designed to safeguard customer records and information.

In its role as Investment Adviser, Braeburn Wealth Management routinely collects nonpublic personal information from clients and prospective clients. This information generally will include but is not limited to:

- Information provided from applications, forms and other information provided to us either verbally or in writing, and include but are not limited to your name, address, phone number, account information, social security number, employment, assets, income and debt;
- Information about your transactions, accounts, trading activity and parties to transactions; health and beneficiary information (such as may pertain to planning and risk management issues);
- Information from other outside sources;
- Any other information that is deemed to be nonpublic personal information as defined by the Act and by state privacy rules.

Braeburn Wealth Management and its staff values its clients’ trust and confidence. The Adviser will never sell the nonpublic personal information we obtain from consumers or clients.

All information provided by clients or prospective clients to Braeburn Wealth Management, (including the Adviser’s personnel), and information and advice furnished by the Adviser to clients, shall be treated as confidential and shall not be disclosed to non-affiliated third parties, except as directed by clients with written authorization, by application to facilitate the investment advisory services offered by the Adviser via an unaffiliated financial services provider (such as the client’s custodial firm), or as required by any rule, regulation or law to which the Adviser or its staff may be subject.

Braeburn Wealth Management maintains clients records in a controlled environment and records are only available to authorized persons of the Adviser who have a need to access client information in order to delivery advisory services, provide administrative support, or to respond to client requests.

Our position on protecting non-public personal information extends beyond the life of the Advisory Agreement. Client information is retained in a protected manner for the time period required by regulators and then is safely destroyed via in-house shredding or a contracted secure shredding service.

Consumers who provide information during an initial consultation or for other purposes but do not become clients of the Adviser also receive privacy protection. Original information will be promptly returned in person or via the mail if the Adviser's services are not engaged. Alternatively, if nonpublic personal information is contained in copies of documents, notes or some other media, this information will be securely filed for a period of up to one year (depending upon likelihood of engagement) before being shredded in-house or via our secure shredding service.

Clients are encouraged to discuss any questions regarding our privacy policies and procedures. Please feel free to contact me with any questions relating to the services we provide you. Thank you.

Sincerely,

Michael Poland, CFA®  
President and Chief Compliance Officer