

Privacy Policy and Notice (Effective January 2019)

How We Use and Protect Information

Protecting your privacy is very important to us. We value your trust. We want you to understand what information we collect, how we protect it and how we may use it. We treat Nonpublic Personal Information (“NPI”) with respect and in accordance with this Privacy Policy.

- We do not sell information about you to third parties.
- We do not share your information for marketing purposes.

Information We May Collect

We may obtain NPI to provide you with the services you have requested. We may collect NPI from you, from your transactions with us, and from outside parties. This NPI may include:

- Your name, address, phone number, social security number, birth date, e-mail address, assets and accounts with others.
- Your transactions and experiences with us or with outside companies, such as brokerage and custodial arrangements and your relationship with your Investment Professional.
- Information relating to your employment, income, finances and other personal characteristics.

Information We May Disclose

We may disclose NPI only in certain instances. The service providers and others to whom we disclose NPI are obliged to use it only for the purposes stated.

Privacy Policy Notifications

We provide our Privacy Policy at the start of the client relationship. We also send a Privacy Policy notice to current clients each year. If you are no longer a client, we will follow our then current Privacy Policy, but we will not send you further notices.

Change in Privacy Policy

We reserve the right to change our Privacy Policy at any time. If we make material changes, we will provide current clients with a revised notice describing our new policy.

Our Security Procedures

We maintain physical, electronic and procedural protections designed to protect and prevent unauthorized access to NPI. Employees who violate our Privacy Policy are subject to disciplinary action.

Online Policy

In addition to the Privacy Policy outlined above, the following privacy principles apply when you visit us on our web sites or communicate with us electronically.

- *Online Information and Collection:* You can visit our public website without telling us who you are and without revealing anything about yourself, including your e-mail address. However, web servers collect the name of the domain you used to access the Internet. We also collect the web site you came from and measure the number of visits, average time spent and other data about visitors to our web site. We use this data to monitor site performance and to make the site easier and more convenient to use.
- *Cookies:* Cookies are small pieces of data stored on your computer. We use cookies to measure website usage and enhance the performance of our public website. We may use cookies to remember your user name so you do not have to re-enter it each time you visit one of our private web sites. You can configure your computer’s Internet browser to

notify you when your computer receives a cookie. You can also prevent your computer from receiving cookies. If you set your browser to not accept cookies, you will limit functionality we can provide you when you visit one of our private websites.

- *Links to other Web Sites:* We are not responsible for the information collected by other web sites if you link to them from our web site. We cannot guarantee how those sites use cookies or whether they place cookies on your computer that may identify you. You should carefully review the privacy policies of each web site you visit to understand how it collects and uses information.
- *Email Communications:* If you provide your email address to us on our public site, we may send you e-mail communications that may be useful to you, including information about our products, services or third parties. You will be given the option to not receive such e-mail messages.
- *Encryption:* We use encryption and authentication tools to protect information we gather on our public and private web sites. However, e-mail communications from other web sites may not be protected. If you are sending us confidential information, you may want to send it by regular mail.
- *Visitors and Registered Users:* As a visitor to our public web site, you may have access to certain features without telling us who you are or revealing any information about yourself. Our public site includes the option to provide your contact information to us. If you provide personal information to us, it will be used to provide communication to you regarding our services. We may require you to become a registered user in order to gain access to and use features of our private web sites. Once you become a registered user, we may collect personal information when you use our web site.

This Privacy Policy replaces all previous notices and statements. This Privacy Policy applies only to Sawtooth Solutions, LLC. This Privacy Policy does not apply to other financial service providers, such as your Investment Professional. Review the privacy policies of those companies to understand how they collect, use and disclose your NPI.