

## PRIVACY POLICY

In the course of client relationships, Secret Blakey & Associates, LLC (SBA) gathers and maintains personal, non-public information regarding its clients' financial circumstances and investment objectives. SBA is committed to maintaining the privacy and confidentiality of the client's information. Accordingly, SBA has adopted a privacy policy in accordance with SEC and FTC privacy regulation, which require investment advisors to determine and disclose how they treat non-public information about their clients and potential clients.

- A. SBA may collect non-public personal information about SBA's clients and potential clients from the following sources:
- Information received from account applications, written questionnaires, interviews/conversations, information forms and other client interactions;
  - Information about transactions with SBA, any affiliates of SBA, or others; and
  - Information SBA obtains or receives from a consumer-reporting agency.
- B. Advisor personnel are prohibited from sharing or disclosing non-public information regarding any client or potential client of SBA, except (i) as necessary to service client accounts including, without limitations, the settlement, billing, processing, clearing, or transferring of client transactions; (ii) with broker-dealer firms having regulatory requirements to supervise certain (Advisor's) activities; or (iii) as otherwise directed by a client. Access to all client files and information, whether in paper or electronic format, is limited to advisor personnel for the purposes of servicing client accounts.
- C. Advisor personnel may not remove client files or information from SBA's premises unless (i) it is necessary to service client accounts; and (ii) prior approval is obtained from the Chief Compliance Officer.
- D. All client files are secured at the end of each business day, and exterior doors always remain locked.
- E. All computers are set up so they "lock" when not in use, requiring a password to gain access.
- F. Traffic flow in the office is restricted, and no individuals, other than employees, are allowed free access to areas where the client's information is held.
- G. Employees working remotely must utilize passwords to gain access to the SBA system servers.

- H. SBA will provide clients with a privacy notice (the “Privacy Notice”) when the client engages SBA for advisory or other services. The Privacy Notice details the types of non-public client information SBA collects, the information SBA shares with third parties or with affiliates, the type of third parties with which SBA shares information, the policies and practices SBA has in place to protect confidentiality and security of non-public client information; the procedures SBA has in place to permit clients or potential clients to opt out of information sharing arrangements with third parties (inapplicable to SBA so long as SBA only shares information with third parties for purposes of servicing client accounts), and SBA’s disposal policy.
- I. SBA shall deliver an updated Privacy Notice to all of its clients annually, even if the policy has not changed since the previous year. “Delivery” may, to the extent allowed by law, mean notification of the availability of the notice on a website.
- J. Privacy Notices may be included in a quarterly report, newsletter or other client mailing. A copy of SBA’s current Privacy Notice is attached hereto.
- K. SBA has undertaken to protect client information in the course of its disposal as well. Employees either utilize personal desk-side shredders or place material to be shredded in a secure retention container. Here it is held until Super Shred arrives to shred materials in bulk.
- L. The Chief Compliance Officer is responsible for evaluating SBA’s compliance with this privacy policy on an ongoing basis.

## **Secret Blakey & Associates, LLC**

### **NOTICE OF PRIVACY POLICY**

*This is for your information only. No action is required on your part.*

At Secret Blakey & Associates, LLC (SBA), protecting your privacy is very important to us. We want you to understand what information we collect and how we use it. We collect and use “non-public private information”, in order to provide our clients with a broad range of financial services as effectively and conveniently as possible. We treat non-public personal information in accordance with our privacy policy.

#### **What Information We Collect and From Whom We Collect It**

We may collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others; and
- Information we receive from non-affiliated third parties, including consumer-reporting agencies.

“Non-public Personal Information” is non-public information about you that we obtain in connection with providing a financial service or product to you.

#### **What Information We Disclose and To Whom We Disclose It**

We do not disclose any non-public information about you without your express consent, except as permitted by law. This applies to current as well as former clients. We restrict access to your non-public personal information to broker-dealer firms having regulatory requirements to supervise certain activities of Secret Blakey & Associates LLC advisors and to those employees, affiliates, and independent third parties who need to know that information in order to provide products and services to you.

Our "affiliates" are companies with which we share common ownership. We do not currently have any affiliated companies.

#### **Our Security Procedures**

We maintain physical, electronic and procedural safeguards to protect your non-public personal information. This includes measures to protect your information in the course of disposal.