

### **CLIENT PRIVACY NOTICE**

This Client Privacy Notice is from Pinnacle Financial Advisors, LLC, a registered insurance agency in the State of Ohio. Pinnacle Wealth Management, Inc. is a wholly-owned subsidiary of Pinnacle Financial Advisors, LLC. Pinnacle Wealth Management, Inc. is an SEC-registered investment advisor firm and is in the business of providing investment advisory services to clients.

We are committed to safeguarding the confidential information of our clients. We hold all personal information provided to our firm in strictest confidence. Our representatives may also be registered representatives of Securities America, Inc. (“SAI”), a registered broker-dealer that is not affiliated with our firm. We may also have relationships with other non-affiliated investment advisor firms such as Securities America Advisors, Inc. (“SAA”), an affiliate of SAI, insurance companies, trust companies, custodians and other financial services entities. Except as required or permitted by law, we do not share confidential information about you with non-affiliated third parties. In the unlikely event there were to be a change in this fundamental policy that would permit or require additional disclosures of your confidential information, we will provide written notice to you, and you will be given an opportunity to direct us as to whether such disclosure is permissible.

### **AN IMPORTANT NOTICE CONCERNING OUR CLIENTS’ PRIVACY**

**CLIENT INFORMATION WE COLLECT:** We collect and develop personal information about you, and some of that information is non-public personal information (“Client Information”). The essential purpose for collecting Client Information is to provide and service the financial products and services you obtain from our firm. The categories of Client Information collected by Pinnacle depend upon the scope of your engagement with us and are generally described below. As an investment advisor, we collect and develop Client Information about you in order to provide investment advisory services. Client Information we collect includes:

- Information we receive from you on financial inventories through consultation with our representatives. This Client Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about your financial products and services transactions with us.

**DATA SECURITY:** We restrict access to Client Information to those representatives and employees who need the information to perform their job responsibilities within our firm. We maintain agreements, as well as physical, electronic and procedural securities measures that comply with federal regulations to safeguard Client Information about you.

**USE AND DISCLOSURE OF CLIENT INFORMATION TO PROVIDE CLIENT SERVICE FOR YOUR ACCOUNT:** To administer, manage and service client accounts, process transactions and provide related services to your accounts, it is necessary for us to provide access to Client Information within our firm and to non-affiliated companies such as SAI, SAA, other investment advisors, other broker-dealers, trust companies, custodians and insurance companies. We may also provide Client Information outside of our firm as permitted by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

**FORMER CLIENTS:** If you close an account with our firm, we will continue to operate in accordance with the principles stated in the Client Privacy Notice.

**REQUIREMENTS OF FEDERAL LAW:** In November 1999, Congress enacted the Gramm-Leach-Bliley Act (“GLBA”). The GLBA requires certain financial institutions, including broker-dealers and investment advisors, to protect the privacy of Customer Information. To the extent a financial institution discloses Client Information to non-affiliated third parties other than as permitted or required by law, clients must be given the opportunity and means to opt out (or prevent) such disclosure. Please note that we do not disclose Client Information to non-affiliated third parties except as permitted or required by law (e.g., disclosures to service your account or to respond to subpoenas).