

# Privacy

Laidlaw Group is committed to safeguarding the personal information that it obtains from its clients. This policy describes how Laidlaw Group protects personal information collected about individuals and institutions that retain its investment services. The provisions of this policy apply to former clients as well as current clients.

## **Personal Information Collected**

Laidlaw Group collects personal information about its clients to evaluate their financial needs, manage their accounts, and provide individualized investment advice. The personal information obtained includes:

- information provided on applications and other forms (such as name, contact information, social security number, occupation, assets, and income) and any additional information communicated to the Company which impacts clients' financial circumstances;
- information about client transactions such as custodial statements and trade confirmations; and
- information obtained from clients in connection with providing financial services such as correspondence and notes from telephone conversations or meetings.

## **Protection of Personal Information**

Access to clients' personal information is limited to those employees who need to know that information to service clients' accounts and help them accomplish their financial objectives. Employees are required to maintain and protect the confidentiality of all personal information and must follow established procedures to do so. To comply with applicable laws and regulations, Laidlaw Group maintains physical, electronic, and procedural safeguards to protect this information. Laidlaw Group also employs technology consultants who help maintain the firm's network and software systems.

## **Information Sharing with Affiliates**

Laidlaw Group currently does not have any affiliates (defined as companies controlled or under common control or ownership). In the event that we have affiliates in the future, we may share the personal information described above as permitted by applicable law. Any future affiliates would be prohibited from sharing that information with non-affiliates.

## **Disclosure to nonaffiliated third parties**

Laidlaw Group may share the personal information described above for business purposes with the following companies not affiliated with us:

- **Financial Service Providers** – such as banks and brokers that provide custody and trade execution necessary to manage clients' portfolios.
- **Professionals** – such as accountants, lawyers, actuaries and trust officers who may be involved in providing ancillary financial services only if clients request or consent to the dissemination of this information.

Also, the Company may disclose personal information with non-affiliated companies and regulatory authorities as required by law. For example, Laidlaw Group may disclose personal information to cooperate with regulatory authorities and law enforcement agencies as necessary to protect its rights.

Except as described in this privacy policy, Laidlaw Group will not disclose or use personal information for any purpose unless directed by its clients to provide such information.

**Accessing and revising personal information**

Laidlaw Group strives to keep its client files complete and accurate. Upon request, a client may gain access to any information it maintains. Clients are encouraged to review their portfolio reports and correspondence and notify the Company if they believe any information should be corrected or updated. Clients are also urged to contact the Company if they have any questions or concerns regarding this privacy policy.