

# THE NAPLES MONEY MANAGERS

## Annual Privacy Policy Notification

January 2020

We enjoy the privilege of assisting clients in reaching their financial goals. When you grant The Naples Money Managers this privilege, we take very seriously our responsibility to safeguard the confidentiality of any information we obtain during the process. We are, therefore, pleased to provide NMM's privacy policy with regard to our handling of your client information:

When you establish a relationship with an NMM financial advisor, you are requested to furnish personal and financial information, which is used to assist in assessing your investment objectives and goals. In accordance with federal regulations, you may also be asked to provide identification documents or other information. What you share in this process is private and confidential, and we are committed to its protection. In addition to the information collected during the course of our relationship, it may also be necessary to collect a variety of non-public personal information from other sources. What is collected may include:

- Information on the new account form and account applications;
- Information about your transactions NMM or others, including your financial advisor;
- Information from NMM's correspondent clearing broker with respect to your account(s);
- Medical information submitted as part of an insurance application; and
- Information received from service bureaus or other third parties.

Information is not shared with any third party other than:

- Your investment advisor;
- Unaffiliated third parties, such as a clearing broker that provides service for the purpose of maintaining your account;
- Government entities or other third parties in response to subpoenas or other legal process as required by law; and
- NMM's parent company, their affiliates, and our subsidiaries as permitted by law.

We are committed to keeping your client information secure, accurate, and current. Physical, electronic and procedural security measures are maintained that comply with applicable state and federal regulations to safeguard confidential client information. This commitment also extends to those individuals who are no longer active clients. It is your responsibility to provide accurate information and to update changes when necessary. You should contact NMM with any updates and/or changes required to your personal information.

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