

We at Cooper/Haims Advisors, LLC understand and appreciate that our clients are concerned about their privacy and about the confidentiality and security of information that we may obtain from them. If you choose to become a client of Cooper/Haims Advisors, you will need to give us certain personal information so that we may open your account and provide the services we have agreed to provide to you. This policy describes the steps we have taken to safeguard your information and the limited situations in which we provide client information to others in connection with services we provide. This Privacy Policy applies to our current and former clients unless otherwise noted.

Most importantly, we do not sell any client information to anyone or disclose client information to marketing companies. Your information is used by Cooper/Haims only to advise you, to make you aware of financial products and services that we or our affiliates (including Alesco Advisors, ESL Federal Credit Union, ESL Investment Services, LLC, and ESL Trust Services, LLC) provide or to complete transactions when necessary.

To affirm our continuing commitment to the proper use of client information, we will observe the following Privacy Principles:

- 1. Recognition of a Client's Expectation of Privacy:** At Cooper/Haims, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. While information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for Cooper/Haims.
- 2. Use, Collection, and Retention of Client Information:** Cooper/Haims limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business and meet your financial needs. We collect information we receive from you on applications, questionnaires or other forms and information about your transactions in your accounts. Information collected can include contact information, biographical and identifying information (such as name, social security number, date of birth, mailing address, email address, phone number and account number(s)), financial information, health information, account information, and transaction and trading information.
- 3. Maintenance of Accurate Information:** Cooper/Haims recognizes that it must maintain accurate client records. Therefore, Cooper/Haims has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Cooper/Haims, employee access to personally identifiable client information is limited to those with a business reason to know such information.
- 5. Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Cooper/Haims places strict limits on who receives specific information about client accounts and other personally identifiable data. Cooper/Haims discloses your nonpublic personal information to nonaffiliated persons for Cooper/Haims': (a) everyday business purposes such as to process transactions, maintain account(s), respond to court orders and legal investigations, or report to credit bureaus; or (b) as permitted by law. This includes but is not limited to sharing information with unaffiliated persons that provide service in connection with your investments and other transactions handled by us in the normal course of our business, including any custodians and/or brokers who maintain accounts for you. Similarly, in dealing with

other service providers, such as mutual fund companies, insurance companies and other investment advisers with whom you have a fiduciary relationship, we will transmit certain personal information. These disclosures are permitted by law and are essential in servicing your account with Cooper/Haims. Cooper/Haims may disclose your nonpublic personal information to nonaffiliated third parties who perform services for us to support the services we provide to you, including to support our advisory, operational, and compliance activities. Cooper/Haims may also share information at the request or with the permission of a client. Please note that Cooper/Haims will not disclose personal, non-public information about its clients to any direct marketer. Information shared with our affiliates is primarily used for everyday business and/or marketing purposes.

- 6. Disclosure of Privacy Principles to Clients:** Cooper/Haims recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our clients. Clients who have questions about these Privacy Principles, have a question about the privacy of their client information, or wish to opt out should call Cooper/Haims at 585.248.6400 or email [cooperhaimsadvisors@cooperhaims.com](mailto:cooperhaimsadvisors@cooperhaims.com).

#### **Other Information for California, North Dakota and Vermont Clients**

California Residents: We will not share information we collect about state residents with companies outside Cooper/Haims unless we have your consent or the law allows. We will limit sharing for joint marketing to where you have provided consent consistent with California law.

North Dakota Residents: We will not share information we collect about state residents with companies outside Cooper/Haims unless we have your consent or the law allows.

Vermont Residents: We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.