

PRIVACY POLICY NOTICE

Protecting your privacy is of utmost importance to all of us at Hendley and Company, Inc. Because of this, we want you to understand what information we obtain, how we use it and, most importantly, how we safeguard it to preserve your personal privacy. This policy applies to our relationship with each individual person who inquires about and/or establishes a client relationship with us for personal, family or household purposes.

WHAT INFORMATION WE COLLECT

We collect nonpublic personal information about you from the following sources:

- information that we receive from you on applications or other forms in connection with opening your account relationship with us, or through your correspondence or communication with us by mail, telephone, Internet or in person; and
- information about your transactions and account relationship with us.

Information we obtain includes, among other things, your name, address, social security number, assets and liabilities, income, investment objectives, time horizon, and risk tolerance. Because we value your privacy, it will always be our practice to obtain only such information we deem important to assist us in helping you meet your financial goals and investment objectives.

OUR SECURITY PROCEDURES

We take steps to safeguard the information that you have entrusted to us. We allow access to your personal and account information only to those employees who need to know that information in order for us to provide the best investment management services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your information.

WHAT INFORMATION WE DISCLOSE TO THIRD PARTIES

Because we know that the security of your information is so important to you, we do not sell any of our client information to anyone. Furthermore, we share information about you with third parties (*i.e.*, people or companies not affiliated with Hendley and Company) only when required in order to meet our contractual obligations to you or as permitted by law.

- sharing information with a third party to assist us in meeting our obligations to you, including processing your transactions and maintaining your accounts;
- responding to court orders, legal investigations or regulatory requests; and
- we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example, to prevent fraud).

Should our customer information privacy policies change in any way, we will promptly inform you and advise you of your privacy rights.

Any client who terminates our relationship in the future can be assured that we will continue to adhere to the privacy policies and practices described in this notice.

We at Hendley and Company value our relationship of trust with you. Should you have any questions about our privacy policy, please contact us at 740-452-4523 or 1-800-421-0075.