



Registered Investment Advisor

## STERNECK CAPITAL PRIVACY POLICY

*Reviewed December 4, 2019*

At Sterneck Capital Management, we consider it a privilege to serve your financial needs and we value the trust you have placed in us. As we serve your financial needs, we are committed to safeguarding your personal information.

We hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you in connection with the services provided by Sterneck Capital Management, LLC. We do not disclose information to non-affiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate a policy change, we would be prohibited under law from making a change without advising you first.

We do share information with others who provide services for our clients\* only if they agree to abide by our privacy policy.

- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- We collect non-public personal information about you from information we receive from you or your primary custodian. This information is typically relayed to us on applications or other forms that you have provided.
- Certain non-affiliated third parties, such as auditors, may require access to your personal information. We also require strict confidentiality in our agreements with them and expect them to keep this information private.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. From time to time we may engage an independent third party to conduct anonymous client surveys on our behalf, though we expect such firms to use information we provide for this sole purpose.
- We limit access to information only to those who have a business or professional reason for knowing. We may disclose all of the information described above to certain third parties who are not affiliated with the firm under one or more of the following circumstances:
  - As Authorized – if you request or authorize disclosure of the information.
  - As Required by Law – for example, to cooperate with regulators or law enforcement authorities.
  - As otherwise Permitted by Law – for example, sharing information with companies that maintain, process or service customer accounts or financial products and services or effect, administer or enforce customer transactions is permitted. Among other activities, we may share information with broker-dealers in order to execute customer trades or with custodians that hold securities on behalf of customers. We believe that sharing of information for these purposes is essential to providing clients with necessary or useful services with respect to their accounts.
- Under Joint Agreements – we may also share information with companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.

- We require service providers to the firm:
  - to maintain policies and procedures designed to assure only appropriate access to information about customers of the firm;
  - to limit the use of information about the firm’s customers to the purposes for which the information was disclosed, or as otherwise permitted by law; and
  - to maintain physical, electronic and procedural safeguards that comply with federal standards to guard non-public personal information about our customers.
  
- We assure the secure destruction of private information.

We will adhere to the policies and practices described in this notice regardless of whether you are a current or former client of the firm. Because privacy matters, we pledge to work together with you to protect and control the security of your confidential financial information.

\*For purposes of this notice, the terms “client” or “clients” include both (i) individuals who have a continuing account management or advisory relationships with the firm (e.g., by having an management contract with the firm) and (ii) individuals who provide nonpublic personal information to the firm, but who do not have a continuing relationship with the firm (e.g., an individual who provides such information in deciding whether to become a client, whether or not the individual establishes a continuing relationship with the firm).

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