

Privacy Policy

Policy

Rothman Investment Management, LLC (RIM) as an investment adviser is required by law to inform clients of their policies regarding its commitment to maintain the confidentiality and security of your personal information. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect, share, and protect in connection with any services that we provide. RIM does not give out your information to unaffiliated third parties, except after receiving your expressed permission or to execute transactions on your behalf. Our policy with respect to personal information about you is listed below.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT:

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION:

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For unaffiliated third parties that require access to your personal information that perform services for us, including financial service companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted or required by law.
- For everyday business purposes – such as processing your transactions and maintaining your account(s)
- For our marketing – to offer our products and services to you
- We will release information about you if you direct us to do so or if we are compelled by law. We will notify you if we are required by law to release your information

Clients may opt out of sharing information for joint marketing to other financial companies, to our OR affiliates and to non-affiliates. If you are a new customer we may begin sharing your information on the day you sign our agreement. When you are no longer our client, we may

continue to share your personal identifiable information for the required time that such records must be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed. However, you can contact us at any time to limit our sharing.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION:

To protect your personal information from unauthorized access and use, we use strict security measures that comply with federal and state law, including computer safeguards and secured files and building.

- RIM maintains a secure office and computer environment to ensure that your information is not placed at unreasonable risk
- We limit employee access to information only to those who have a business or professional reason for knowing, and only to unaffiliated parties as required or permitted by law
- RIM does not provide any of your personal information to mailing list vendors or solicitors and does not intend to do so

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT:

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

KEEPING YOU INFORMED:

If at any time, it is necessary to disclose any of your information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are extremely important to us.

Definitions:

Affiliates – companies related by common ownership or control. They can be financial and non-financial companies;

Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies;

Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.