

PRIVACY POLICY NOTICE

FACTS

WHAT DOES LUDWICK & SHIRMAN, LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depends on the product or service you have with us. This information can include, but is not limited to:

- · Social Security number and income;
- Assets and transaction history; and
- Investment experience and risk tolerance.

When you are no longer our client, we continue to share your information as described in this notice.

How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Ludwick & Shirman, LLC chooses to share and whether you can limit this sharing.

Reasons we can share your personal information:	Does Ludwick & Shirman ?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes— to offer our products and services to you	NO	We do not share
For joint marketing with other financial companies	NO	We do not share
For our affiliates' everyday business purposes—information about your transactions and experiences	NO	We do not share
For our affiliates' everyday business purposes—information about your creditworthiness	NO	We do not share
For our affiliates to market to you	NO	We do not share
For non-affiliates to market to you	NO	We do not share

To limit our sharing

Please note:

If you are a new client, we can begin sharing your information from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions? Call: 303-444-1161

Who we are	
Who is providing this notice?	Ludwick & Shirman, LLC

What we do		
How does Ludwick & Shirman, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We also maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.	
How does Ludwick & Shirman, LLC collect my personal information?	 We collect your personal information, for example, when you open an account or give us contact information enter into an investment adviser contract or give us your income information tell us about your investment or retirement portfolio We also collect your personal information from other companies. 	
Why can't I limit all sharing?	Federal law gives you the right to limit only sharing for affiliates' everyday business purposes—information about your creditworthiness affiliates from using your information to market to you sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing	

Definitions		
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • NONE	
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • NONE	
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • NONE	

Other important information