

Grimes & Company, Inc. (referred to as “Grimes”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, Grimes attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of Grimes to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client’s engagement of Grimes. In that regard, Grimes may disclose the client’s information: (1) to individuals and/or entities not affiliated with Grimes, including, but not limited to the client’s other professional advisors and/or certain service providers that may be recommended or engaged by Grimes in furtherance of the client’s engagement of Grimes (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by Grimes to facilitate the commencement/continuation/termination of a business relationship between the client and/or between Grimes and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client’s engagement of Grimes (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Grimes permits only authorized employees and affiliates who have signed a copy of Grimes’ Privacy Policy to have access to client information. Employees violating Grimes’ Privacy Policy will be subject to Grimes’ disciplinary process. Additionally, whenever Grimes hires other organizations to provide services to Grimes’ clients, Grimes will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact Michael J. Davide, Chief Compliance Officer.