

## **Howe & Rusling Privacy Statement** (Revised April 4, 2008)

At Howe & Rusling, your privacy is our priority. We hold all personal information provided to our firm in the strictest confidence. Howe & Rusling protects personal information in a number of important ways. All Howe & Rusling employees are subject to a strict employment policy regarding confidentiality. Howe & Rusling takes substantial precautions in seeking to ensure that our systems are secure and that they meet industry standards by maintaining physical, electronic, and procedural safeguards.

### **What information is, or may be, collected from you?**

During the course of our relationship with you, we will collect a variety of nonpublic personal information from you. Examples of this type of information are:

- Personal information such as name, address, phone number, date of birth, and social security number
- Financial information such as income, net worth, risk tolerance, account numbers, tax bracket, assets, and liabilities
- Personal family information such as names, addresses, and dates of birth of family members

### **How is information collected?**

Information is collected from you in several ways:

- Directly from you through meetings and phone calls
- From your account applications, advisory contracts, and other similar items
- From non-affiliated third parties such as your accountant, attorney, financial planner, and other professionals
- From members of your family
- From information received directly from your account custodians

Please note that we will not disclose any of your personal information to your attorney, accountant, other financial professionals, or family members without your prior permission. You may give us consent by listing this information on your investment advisory Letters of Agreement or by informing us in writing.

### **With whom will we share your information?**

We use personal information in ways that are compatible with the purposes for which we originally requested it. For example, we will use the information you give us to process your requests and transactions, to provide you with additional information about products and services, such as estate planning, or to evaluate your financial needs. We also use your information in ways that allow us to do business. In order to do this, we will share your information with:

- Your account custodians and brokerage firms with whom we trade
- Individuals you have directed us to speak with, such as your accountant, attorney, other financial professionals, and family members
- Our advisory affiliates (any company that controls, is controlled by, or is under common control of Howe & Rusling), without limitation
- Our vendors that allow us to maintain or service your account, such as computer consultants, portfolio management software vendors, and Internet based financial planning investment research firms
- Our accountants and other industry professionals for performance verification and annual audits
- Regulators such as the Securities and Exchange Commission and other law enforcement authorities when we are required to disclose your information by law

We do not sell personal information to anyone. We will not disclose any of your personally identifiable information to non-affiliated third parties unless we have your permission. Examples of these types of non-affiliated third parties are individuals we have hired to provide additional services for you such as estate planning attorneys and other similar financial professionals. These types of parties are required to conform to our privacy standards.

### **What about our website and e-mail communications?**

Our website at [www.howeandrusing.com](http://www.howeandrusing.com) contains links to other sites. Howe & Rusling is not responsible for the privacy practices or contents of other websites. Upon your request, we will communicate with you using e-mail. Please keep in mind that we cannot guarantee the security of information you submit or we submit to you when it travels across the Internet.

### **Contacting Us**

We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date. If you find any error in your personal information or need to make a change to that information, please contact us and we will promptly update our records.

### **Changes to Our Policy**

We reserve the right to change or update this policy. Should we do so, you will be immediately notified in writing. If you have any questions regarding this policy, please feel free to contact us.