

# WHITEGATE INVESTMENT COUNSELORS, INC.

FINANCE AND INVESTMENT COUNSEL

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## PRIVACY NOTICE

The Securities and Exchange Commission (“SEC”) issued its final rule effective November 30, 2000 regarding the obligation of investment advisors and other securities firms to protect the financial privacy (i.e. so-called “nonpublic personal information”) of their customers. The rule requires firms such as Whitegate Investment Counselors, Inc. to (i) implement formal procedures to safeguard such data and (ii) advise all customers in writing of those procedures.

You have entrusted your investments to us, and by extension you have entrusted us also with confidential personal and financial information as well. In keeping with our responsibility to you and our own company mission, we are committed to acting responsibly and in your best interests as stewards of your private information. This notice is intended to help you better understand how we fulfill this commitment.

### Information We Collect

We must collect, retain, and use non-public personal information about individual clients to provide services. This information may be collected from applications or other forms as well as information about your transactions with us or with others.

### Who Receives Information and Why

We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted or required by law. Any information we collect will be disclosed for the sole purpose of delivering the services we’ve contracted to provide. We may enter into arrangements with companies or firms whose expertise is essential to the smooth functioning of Whitegate Investment Counselors, Inc.’s services, such as transaction-processing. Third party firms providing administrative services such as marketing, printing, mailing and computer consultation may have access to customer information in order to perform their tasks. We require these companies to protect the confidentiality of the information to which they may have access, and to use it solely for the services for which we hired them. They are not permitted to use or share this information for any other purpose. Under no circumstances will Whitegate Investment Counselors, Inc. sell client information.

### How We Protect Your Information

We maintain physical, electronic, and procedural safeguards to protect your non-public information. Access to this information is restricted to personnel necessary to service your accounts.

**This document will serve as our formal notice to you as required by Regulation S-P of the Gramm-Leach-Bliley Act, aka “The Privacy Act”.**