



Privacy Notice

Updated June 2024

FACTS	WHAT DOES WHITEGATE INVESTMENT COUNSELORS, INC. (WICI) 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 laws also require us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and shares on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security Number, Driver’s License Number/Passport Information • Date of Birth • Assets, Income, Financial Net Worth • Investment Experience • Account balances, Account Transactions, Transaction History, Account Numbers <p>As required by law, when you are no longer a customer, we will continue to hold your information and share it as described in this notice.</p>
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information, the reasons Whitegate Investment Counselors, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can shares your personal information	Does WICI share?	Can you limit the sharing?
For our everyday business purposes – Such as to process your transactions, maintain your account(s), and to determine your suitability for services.	<YES>	<NO>
We share your personal information with the firm’s attorneys, accountants, and auditors or other determining compliance with industry standards or to respond to court orders and/or legal investigations.	<YES>	<NO>
For our marketing purposes – To provide you with announcements and documents regarding our services to you.	<YES>	<YES>
For joint marketing with other financial companies, affiliates, or nonaffiliates (we have no affiliates)	<NO>	<We do not share>
For our affiliates’ everyday business purposes – Information about your accounts, transactions, etc.	N/A – we have no affiliates	<We do not share>
For nonaffiliates’ everyday business purposes – Information about your accounts for tax preparation, tax planning, and estate planning purposes with your attorney, accountant, or other professional as designated by you.	<YES>	<YES>
For nonaffiliates to market to you	<NO>	<We do not share>

Questions?	Whitegate Investment Counselors, Inc.- Attention: Chief Compliance Officer Phone: 603-228-5471 143 North Main Street, Suite 203 Concord, NH 03301 www.whitegateinvest.com
Who we are	
Who is providing this notice?	Whitegate Investment Counselors, Inc. 143 North Main Street, Suite 203 Concord, NH 03301

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

Other Important Information

Information for California, North Dakota, and Vermont Customers:

In response to applicable state law, if the mailing address provided for your account is California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

California, North Dakota, and Vermont clients have other protections under state law. If your primary mailing address is in California or Vermont, we will not share your credit or financial information that we collect except as permitted by law, including, for example, with your consent or to service your account. We will also not use your information for joint marketing purposes. We do not share client information with third parties except as permitted by law.

California residents may be eligible to exercise consumer privacy rights under the California Consumer Privacy act or "CCPA" (Cal. Civ. Code §1798.100 et seq.). This notice is provided according to the CCPA, and, if eligible, you may exercise the following rights. You have the right to know about the personal information collected, disclosed, or sold. Please contact as directed above or use the mail-in form provided at the end of this notice.

1. We may collect information about your employment, financial, location, and government-issued information.
2. We may obtain personal information directly from the individual or government entities to provide, maintain and service your account(s). We may also utilize this information for:
 - Compliance/legal and regulatory purposes
 - Identity protection/fraud prevention/safety and security
 - Client concerns/complaints
3. We may provide information to the following third (3rd) parties to process transactions and maintenance of accounts:
 - Service providers
 - Operating systems and platforms
 - Government entities
 - Data analytics
 - Affiliates

Important information for Nevada residents – At any time, you may request to be placed on SWM’s internal do-not-call list by calling us at 603-228-5471. Nevada law requires that we provide you with the following contact information to enable you to obtain further information: (i) WICI at our contact information, listed above; and (ii) Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, Nevada 89101, Phone: 1-702-486-3132, email: BCPINFO@ag.state.nv.us.

What we do

How does WICI protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with state and federal laws. These measures include limiting your information to exposure from unauthorized individuals, certain computer safeguards, and secured files and buildings. Our online environment uses security technologies, including layered security and access controls over personal information. For further information, call us at 603-228-5471.
How does WICI collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none">• Open an account or deposit money• Enter into an investment advisory agreement• Seek advice about investments• 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 us the right to limit only <ul style="list-style-type: none">• Sharing for affiliates’ everyday business purposes – information about your creditworthiness• Affiliates from using your information to market to you• Sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Mail-In Form

Privacy Choices Notice

If you would like to limit the personal information where applicable, please email our Chief Compliance Officer at: pwolfe@whitegateinvest.com or complete and mail the following form to:

Whitegate Investment Counselors, Inc.
Attn: Chief Compliance Officer
143 North Main Street, Suite 203
Concord, NH 03301
Phone Number: 603-228-5471

You can withdraw your opt-out choice at any time by contacting us by email or in writing to the address provided above. If you limit sharing information to our affiliates, you will not be able to receive combined services with our affiliate until you revoke the limitation on sharing information.

WICI does not permit financial professionals to port your information to a new investment advisor or financial institution when they terminate employment with our firm. If your primary address is in a state that requires your affirmative consent to share your personal information with the New Firm, then you must give your written consent before we will allow your financial advisor to take any of your personal information to that New Firm.

By completing and returning this form as described, I am instructing WICI to limit the personal information about me where applicable and any information that my investment advisor could disclose or take if he or she moves to a brokerage or investment advisory firm upon termination of the relationship with WICI. However, I understand that WICI may disclose my name, address, telephone number, email and the account title of the accounts serviced by my advisor to any brokerage or investment advisory firm as allowed under federal and certain state laws.

**Please note that for accounts held jointly by two or more persons, the privacy made by any account holder applies to all joint holders with respect to the account.

In order for your opt-out election to be effective, you must complete ALL of the following information:

Name (please print clearly): _____

Address: _____

City: _____ State & Zip: _____

Signature: _____ Date: _____