

# Van Sant and Mewshaw, Inc.

## Registered Investment Advisor

### Client Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our clients are confident that we will manage their financial affairs expertly and confidentially.

At Van Sant And Mewshaw, Inc., our clients have access to a broad range of products and services from basic banking products, investments, and online trading. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain client information.

We want to assure all of our clients that whenever information is used, it is done with discretion. The safeguarding of client information is an issue we take seriously at Van Sant And Mewshaw, Inc. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our clients.

- 1. Recognition of a Client's Expectation of Privacy:** At Van Sant And Mewshaw, Inc., we believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for Van Sant And Mewshaw, Inc.
- 2. Use, Collection, and Retention of Client Information:** Van Sant And Mewshaw, Inc. limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients.
- 3. Maintenance of Accurate Information:** Van Sant And Mewshaw, Inc. recognizes that it must maintain accurate client records. Therefore, Van Sant And Mewshaw, Inc. has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Van Sant And Mewshaw, Inc., employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Van Sant And Mewshaw, Inc. employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.
- 5. Protection of Information via Established Security Procedures:** Van Sant And Mewshaw, Inc., recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, Van Sant And Mewshaw, Inc. has established appropriate security standards and procedures to guard against any unauthorized access to client information.
- 6. Restrictions on the Disclosure of Client Information:** Van Sant And Mewshaw, Inc. does not, under any circumstances share client information with unaffiliated parties, unless we are legally required to do so, or we have the permission of the client.
- 7. Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
- 8. Disclosure of Privacy Principles to Clients:** Van Sant And Mewshaw, Inc. recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should call his/her Investment Counsellor.