

# YULE CREEK WEALTH MANAGEMENT, LLC

## PRIVACY NOTICE TO CUSTOMERS

### Introduction:

At Yule Creek Wealth Management, LLC (“Yule Creek”), maintaining our clients’ trust and confidence is critical to our business. We are committed to your privacy and safeguarding your personal information while we provide our service in an accurate and efficient manner. To do so we must collect, share, and maintain certain non-public personal information about you. This document explains how we collect, share, and protect your non-public personal information.

To keep you informed of the steps we have taken towards protecting your personal information, we describe in this privacy notice the information we collect, our policies for keeping that information confidential and our procedures for safeguarding your information. We consider these matters to be of utmost importance and trust that the explanations below will help you to better understand what we do with your personal data.

### Our Commitment to You:

Yule Creek is committed to protecting your non-public personal information and will make efforts to ensure that such information is only used for proper business purposes in connection with the management of your account.

### Information we collect & share:

In providing our products and services to you, we collect and share certain non-public personal information about you.

- How does Yule Creek collect your information?
  - Account opening process
  - Other account applications or forms (Money Link, Prime Brokerage, Transfer of Assets, etc.)
  - Seek advice about your investments
  - Give us your account information or provide employment information
  
- What information do we collect and share?
  - Information from applications: Name, social security number, date of birth, contact information, investment experience
  - Information about your transactions: trading activity, money transfers, withdrawals/contributions, account balances, account income, performance data
  - Information we obtain for the purpose of tax reporting to you or various agencies we must report to as required by law
  - Other information we collect as part of servicing your account(s)

### Reasons we collect and share your personal data:

We disclose to non-affiliated third parties non-public personal information only for the purpose of providing you our services. We do not sell your non-public personal information to anyone. For a more detailed discussion of the reasons we collect and share your personal data, please read below.

- **Everyday business purposes:** To administer, manage, and service customer accounts, process transactions and provide related services for your accounts, it is necessary for us to provide access to personal information at Yule Creek and to certain non-affiliated companies such as custodians, broker-dealers, performance and reporting software providers, professional licensing authorities, attorneys, accountants, auditors, performance data providers and governmental agencies as provided by law.
  - Does Yule Creek share? YES
  - Can you limit this sharing? NO
- **Affiliated third parties:** Yule Creek is not related to any outside companies by common ownership or control.
- **Non-affiliated third parties:** Yule Creek does not share your personal information to non-affiliates except for everyday business purposes as described in this notice and as permitted by law.
- **Your investment advisor terminates his or her relationship with Yule Creek:** Yule Creek does not allow terminated employees to retain your personal information, unless you instruct us to do so.
- **Former customers:** When you are no longer a client, we continue to maintain your information as described in this notice and as required by law.

### When you can limit sharing:

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes – information about your creditworthiness.
- Affiliates from using your information to market to you.
- Sharing for non-affiliates to market to you.

We do not share your information in any of these ways. State law and individual companies may give you additional rights to limit sharing.

### Opt-out:

Clients cannot opt out of allowing Yule Creek to share their non-public personal information with non-affiliated third parties which are necessary to service their accounts.

### Safeguards for protecting your privacy

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide our services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information. These methods include ongoing employee training, computer safeguards such as firewalls, anti-virus software, personal device restrictions, network passwords, file security and building security. We regularly review and update our technology, cybersecurity policies and other security procedures to improve our ability to protect your data.

### Definitions:

- **Affiliates:** Companies related by common ownership or control. They can be financial or non-financial companies.
- **Non-affiliates:** Companies not related by common ownership or control. They can be financial or non-financial companies. For example, performance reporting and portfolio accounting companies.
- **Non-public Personal Information:** Personally identifiable financial information that we collect about you in the process of providing you with our products and services, which information has not been lawfully made available to the general public. On the other hand, publicly available information (such as governmental real estate records, published telephone numbers, etc.) is information that is lawfully available to the general public. However, “nonpublic personal information” also includes any lists or other grouping of consumer information that are created using any publicly available information from one or more clients.

### Notification to customers:

This Privacy Policy notification will be sent to you annually or upon any significant changes for as long as you are a client of Yule Creek. We will not revise this policy to permit the sharing of your non-public personal information without first notifying you and providing you with an opportunity to prevent the information from being shared.

If you have any questions about our privacy policies, our procedures for protecting your personal financial information or any other questions or comments, please contact our Chief Compliance Officer, Nathaniel Kaup, at:

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