

Privacy Notice

Holmes Investment Management, Inc.'s primary client goal is to protect your privacy.

To conduct regular business, the types of personal information we collect and share depend on the service you have with us. This information can include: *Income; Account Balances; Assets; Investment Experience; Account Transactions; Risk Tolerance; Retirement Assets.*

All information will remain confidential. Holmes Investment Management, Inc. may only share your nonpublic personal information as permitted by law in the following circumstances:

- For our everyday business with service providers to process your transactions and maintain your account(s). Our service providers have agreed to keep your nonpublic personal information confidential;
- For resolving consumer or customer disputes or inquiries;
- To persons holding a legal or beneficial interest relating to the consumer or customer;
- To persons acting in a fiduciary or representative capacity on behalf of a consumer or customer;
- To provide information to agencies assessing your firm's compliance with industry standards, and to your attorneys, accountants, and auditors;
- In connection with a proposed or actual sale or merger of your firm;
- To respond to a regulator's examination of your firm; or
- To comply with a civil, criminal, or regulatory investigation by federal, state, or local authorities.

Information Safeguarding

Holmes Investment Management, Inc. will internally safeguard your nonpublic personal information by restricting access to only those employees who provide products or services to you or those who need access to your information to service your account. In addition, we will maintain physical, electronic and procedural safeguards that meet federal and/ or state standards to guard your nonpublic personal information.

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