## HENRY H. ARMSTRONG ASSOCIATES, INC. INVESTMENT MANAGEMENT

Privacy Policy rev. January 2011

At Henry H. Armstrong Associates, Inc., we recognize the importance of protecting the personal and financial information of our clients. We consider each client's personal information to be private and confidential. We choose carefully how we share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. The following describes the practices we follow:

The types of personal information we collect and share can include:

• Social Security number, account number, account income, account holdings, account balances, account transaction history, transaction gain or loss history, and management fee payment history.

When you are *no longer* our customer, we continue to share your information as described in this notice.

All financial companies need to share client personal information to run their everyday business. Reasons we can share your personal information and you cannot limit this sharing include:

- For our everyday business purposes servicing your account, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.
- For our marketing purposes, to provide services or financial products requested by you.

Federal law gives you the right to limit our sharing of your personal information for marketing with other financial companies, for our affiliates' (Armstrong Equity Management LLC) everyday business purposes, or for nonaffiliates to market to you. Henry H. Armstrong Associates <u>does not</u> share your personal information for these purposes. State laws and individual companies may give you additional rights to limit sharing.

We will not disclose any nonpublic personal information about you to anyone, except as permitted by law. Confidential information will not be released to any individual company, without first confirming the identity of any individuals requesting the client's confidential information <u>and</u> obtaining the client's permission to release such information.

Henry H. Armstrong Associates uses security measures to protect your personal information that comply with federal law. These measures include procedural safeguards, computer safeguards, and secured files and buildings.

Henry H. Armstrong Associates collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications, forms, and other information you provide to us in writing, by telephone, electronically or by any other means;
- Information about your transactions with us or others.

\*\*\*\*\*\*\*

Please call if you have any questions, because your privacy, our professional ethics, and the ability to provide you with quality investment management are very important to us.