

Lakeland Investor Services, Inc.
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PRIVACY POLICY

Investment Advisers in general are required by law to inform their clients of their policies regarding privacy of client information. Lakeland Investor Services, Inc. ("LIS"; the "firm") is bound by professional standards of confidentiality that are, at minimal, at least as stringent as those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires the "firm" to tell you how your personal information is collected, shared, and protected.

**TYPES OF NONPUBLIC PERSONAL INFORMATION
(NPI) THE "FIRM" COLLECTS**

"LIS" collects certain nonpublic personal information about you that is either provided to the "firm" by you or obtained by the "firm" with your authorization. This can include but is not limited to your name, address, Social Security number, Date of Birth, banking information and bank account numbers and/or balances, sources of income, credit card numbers, information pertaining to your employment, your beneficiary designations, and/or other information. When you are no longer a customer of the "firm", "LIS" may continue to share your information only as described in this notice.

**PARTIES TO WHOM YOUR PERSONAL INFORMATION
MAY BE DISCLOSED**

All Investment Advisers, in general, may need to share a client's personal information to run their everyday business. The section below lists the typical reasons that "LIS" may share your personal information:

- For everyday business purposes, such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations or report to credit bureaus where required by law;
- For building/maintaining financial plans and certain financial and performance reports through non-affiliated software technology vendors to better serve your financial needs; this is necessary in order to engage the "firm's" non-affiliated business services within the framework of their product offerings, and may include nonpublic personal information as listed above as well as information about your financial holdings and transactions.
- For the marketing needs of "LIS" and its affiliates; to offer products and services to you;
- For joint marketing with non-affiliated financial companies, including financial services vendors (custodial firms, mutual funds companies, insurance companies, etc.); and for such non-affiliates to market to you.

Clients of "LIS" may elect to opt out of sharing information for joint marketing to other non-affiliate financial companies. However, opting out of sharing information with certain "firm" non-affiliates may limit the scope and ability of "LIS" to fully serve your financial needs. If you are a new customer, "LIS" may begin sharing your information on the day you sign the "firm's" advisor agreement. When you are no longer an "LIS" customer, the "firm" may continue to share your information as described in this notice. However, you can contact "LIS" at any time to discontinue "LIS" sharing your information through the "firm's" non-affiliated software technology vendors, where "LIS" has the ability to further influence the sharing of your information.

**PROTECTING THE CONFIDENTIALITY OF CURRENT
AND FORMER CLIENT'S INFORMATION**

To protect your personal information from unauthorized access and use, "LIS" uses security measures that comply with federal law, including computer safeguards and secured files and building.

**FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT
SHARING - OPTING OUT**

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for affiliates' everyday business purposes; information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify "LIS" immediately, by mail, email or telephone if you choose to opt out of these types of sharing.

DEFINITIONS:

Affiliates - companies related by common ownership or control. They can be financial and nonfinancial companies;
Non-affiliates - companies not related by common ownership or control. They can be financial and nonfinancial companies;
Joint marketing - a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Please call if you have any questions. Your privacy, the firm's professional ethics, and the ability to provide you with quality financial services are very important to Lakeland Investor Services, Inc. and its affiliates.