## Comprehensive Investment Management, LLC Privacy Policy - Client Information

(Updated March 2018)

The Pennsylvania Department of Banking & Securities requires the financial service companies it regulates to provide clients with an annual notice about company privacy policies and procedures concerning client information.

There has been no substantial change in our policies and procedures since the last time we provided you with this information.

Especially in today's identity theft and electronic communication era, we are more aware than ever that you have entrusted to us personal and financial data, and we hold ourselves to the highest standards in its safekeeping and use.

In order to provide investment management and related financial planning services, it is necessary, obviously, for us to collect pertinent financial and related information about you, and perhaps members of your family. We get this information only from you and other parties you may designate.

We restrict access to the information for appropriate use by our staff and have policies in place to physically protect it. We shred all discarded records and paper work. We suggest you shred as well, because low tech methods such as trash rummaging are some of the most successful methods employed by identity stealers and other forgers.

In compliance with rules established by the Certified Public Accounting and Certified Financial Planning professions, we do not disclose any information to any other party, unless specifically authorized by you. However, CIM reserves the right to disclose or report personal information where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities.

Please know that whatever the reason for sharing your personal information, we take what steps we can to try to assure that those parties respect your privacy by limiting the use of the information to the purpose for which it was disclosed.

Finally, we share our client list with no one. If a new client asked us for references, we will, of course, ask you first before giving them your name, and may suggest you call them, rather than the other way around. Such requests have been rare, because the great majority of our new clients come to us by referral.

We continue to be committed to working for your benefit, while protecting your privacy and earning your trust as a valued and objective adviser. If you have any questions about this or any other matter, please give us a call.

Thank you.

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