

## CS McKee Privacy Policy

We recognize that the relationship we have with our various clients is our most important asset. That relationship is founded upon the client's trust and confidence in CS McKee. An essential component of that relationship is the commitment that we make to protect information relating to each account. Since we believe that it is the desire of our clients to protect their privacy, we will not disclose personal information to any party unless it is required by law, the client has provided us with specific written direction, or such disclosure is integral to the provision of our investment advisory services to that account. Under no conditions will C. S. McKee sell client information to anyone.

### **WHAT INFORMATION IS COLLECTED, MAINTAINED AND COMMUNICATED?**

In the course of establishing and maintaining account relationships, it is common to collect certain information that relates to various aspects of our business. While this information is available to internal CS McKee marketers, it is not distributed to any outside marketing group.

Examples of the kind of information collected and maintained include:

1. Account information, including contact names, addresses and phone numbers are compiled when the account is opened.
2. Trade tickets and account statements generated as output from our processes.
3. Reports from third parties such as custodians or brokerage houses received and maintained as record for the accounts.

### **INFORMATION PROTECTION**

To fulfill our privacy commitment to clients, certain steps have been taken to ensure that such information is protected.

#### Physical Safeguards:

- Our primary office and off-site storage area is guarded 24/7 by security personnel
- Our office is locked to the general public during off-hours.
- General file cabinets can also be secured if they contain sensitive information.
- Backups are stored on-site and in the cloud for redundancy.

#### Electronic Safeguards:

- Our network is guarded by a firewall to prevent hacking.
- All PC's, laptops and mobile devices are password protected. Inactivity will cause the devices to be locked.
- MFA (multi-factor authentication) through Azure is required to log into any McKee service from any device.

#### Policies and Procedures:

- Access to client information is restricted to employees requiring the information to satisfactorily perform their jobs.
- Employees may not use private email to conduct business.
- Confidentiality clauses are resident in the contracts governing our business relationship with outside service providers requiring client information.
- CS McKee will not disclose personal information relating to a current or former client account or account representative unless one or all of the following conditions are met:
  - a) Written consent has been received from the client.
  - b) CS McKee is permitted by law to provide such information.
  - c) We believe that the recipient of any information has been identified in writing by you as your authorized representative.
  - d) The recipient provides services to the account essential to provide investment management for the account.