

CSM ADVISORS, LLC

Privacy Policy

Effective January 5, 2026

For purposes of this Privacy Policy the terms "CS McKee," "McKee," "CSM," "CSM Advisors," and "CSM Advisors, LLC" are used interchangeably and all refer to the same legal entity, CSM Advisors, LLC, unless otherwise specifically stated.

Privacy Policy

The Firm's relationship with our clients is its most important asset. That relationship is founded upon the client's trust and confidence in Advisors. An essential component of that relationship is the commitment that we make to protect information relating to each account. In order to best protect our clients' 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 CSM Advisors sell client information to anyone.

Although very little Personally Identifiable Information (PII) is obtained from our primarily Institutional client base, serious discretion is given as to how that information is shared internally. IT policies and procedures are designed to only allow access to PII if it is necessary to perform the duties of the individual. All client related documents that are physically stored in our offices are in locked files and all electronic copies are behind firewalls on the system. Any documents that require destruction are put into a locked container that is picked up by a third party for shredding. Retired hardware is also destroyed by a third party (Iron Mountain).

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 CSM Advisors marketers, it is not distributed to any outside marketing group. Examples of the kind of information collected and maintained include:

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

CS MCKEE INFORMATION PROTECTION

To fulfill the 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 and video surveillance.
- Our office is locked to the general public during off-hours.
- File cabinets containing any PII or sensitive information are secured.
- 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 and enabled with MFA. Inactivity will cause the devices to be locked.

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.
- CSM Advisors 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:
 - Written consent has been received from the client.
 - CSM Advisors is permitted by law to provide such information.
 - The recipient of any information has been identified in writing by a client as its authorized representative.
 - The recipient provides services to the account essential to provide investment management for the account.

The CSM Advisors Management Committee has adopted this policy of client information protection as a firm-wide practice.