



## PRIVACY NOTICE

Pacific Capital Works, Inc. ("PCW") believes it is essential to maintain the privacy of the nonpublic personal information provided to us and obtained in connection with our services.

PCW limits the use, collection, and retention of client information to what we think is necessary or useful to conduct our business and to provide and offer you quality services. Information collected may include, but is not limited to name, address, and telephone number, tax identification number, date of birth, employment status, annual income, and net worth.

In providing products and services to you, we collect nonpublic personal information about you from these sources:

- Information we receive from you on applications or other forms (e.g. investment/insurance applications, new account forms, and other forms and agreements);
- Information about your transactions with us, our affiliates, or others (e.g. broker/dealers, clearing firms, or other chosen investment sponsors); and
- Information we receive from consumer reporting agencies (e.g. credit bureaus), as well as other various materials we may use to put forth an appropriate recommendation, or to fill a service request.

PCW places strict limits on who receives specific information about your account(s) and other personally identifiable data. Because we rely on certain third parties for services that enable us to provide our advisory services to you, such as our attorneys, auditors, other consultants, brokers, and custodians who, in the ordinary course of providing their services to us, we may share such information with such third parties containing your nonpublic personal information. Additionally, we will share such information where required by legal or judicial process, such as a court order, or otherwise to the extent permitted under the federal privacy laws.

In limited circumstances, PCW may share information with nonaffiliated third parties who provide a product or service that may benefit you. Whenever we do this, we share the minimum amount of information necessary for that Company to offer its product or service to you. Moreover, we carefully review the Company and the product or service to make sure that it provides value to you. Where we provide personally identifiable information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship with you.

If you prefer that we not disclose confidential personal information about you to nonaffiliated

third parties who provide a product of service that we feel would benefit you, you may direct us not to make disclosures to such nonaffiliated third parties by checking the opt-out provision below.

We restrict access to nonpublic personal information about you to those persons associated with PCW, who need access to such information in order to provide our services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

PCW reserves the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. However, you will be promptly provided with a current copy of our privacy notice upon material changes or upon request. So long as you remain an active customer, you will receive a current copy of our privacy notice at least annually. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights, and do not modify or amend any agreements we have with you.

If you have questions about this privacy policy, or if you wish to “opt out” at any time, please call Todd Brundage at (971) 255-0888.