



PRIVACYNOTICE

We at The Holben Group, LLC want you to know that we pride ourselves in our efforts to maintain the privacy, safeguarding and confidentiality of any personal financial information that you provide to us and that we obtain in connection with providing our financial products and services to you. We believe it is essential that we safeguard your personal financial information and have adopted these policies and procedures in an effort to satisfy you that we have taken steps to protect your personal financial information and to prevent it from being disclosed to parties that are not part of our network for providing you with our financial products and services.

In an effort to keep you informed of the steps we have taken towards protecting your personal information, we describe in this privacy notice the information we collect, our policies for keeping that information confidential and our procedures for safeguarding your information. We consider these matters to be of utmost importance and trust that the explanations below will help you to better understand how we protect your personal information.

Information We Collect

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

1. Information we receive from you on applications or other forms; and
2. Information about your transactions with us, our affiliates, or others.
3. Information we receive from consumer reporting agencies.

Information We Disclose

We do not disclose any nonpublic personal information about you to anyone, except to provide you with our financial products and services and to carry out your instructions, and except as permitted by law consistent with these policies.

What is “Nonpublic Personal Information?”

When we refer to “nonpublic personal information,” we are referring to personally identifiable financial information that we collect about you in the process of providing you with our products and services, which information has not been lawfully made available to the general public. On the other hand, publicly available information (such as governmental real estate records, published telephone numbers, etc.) is information that is lawfully available to the general public. However, “nonpublic personal information” also includes any lists or other grouping of consumer information that are created using any publicly available information from one or more clients.

Safeguards For Protecting Your Privacy

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Any Questions?

If you have any questions about our privacy policies, our procedures for protecting your personal financial information or any other questions or comments, please do not hesitate to contact:

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