



## **PRIVACY POLICY AND SAFEGUARD PLAN**

### **Customer Privacy Policy**

Lesa Sroufe & Co., Inc. and its employees understand that acting in the capacity of an investment advisor requires that we maintain the trust and confidence of the client. The sharing of personal and financial information is critical to the firm's delivery of customized and suitable investment advice. To this end, LSC is presenting this Privacy Policy to our clients to state the specific internal security procedures we follow.

We strive to maintain accurate records of information you provide. If at any time you believe that the information we have about you and your account is not complete or accurate, please contact us so we may promptly correct any inaccuracy.

In addition to privacy and safeguarding of information, we attempt to provide the type of contact that is most convenient for you. This contact would include phone contact, in-person meetings, written correspondence, facsimile and email. We hope that if you have any change in communication preference, that you will inform us so we may take appropriate action.

### **The Need for Confidential Information**

Due to the complexities and uniqueness of each client's personal goals and financial matters, we collect information which will help us deliver services which meet your requirements and expectations. This may include nonpublic personal, financial and health information about you contained in information we receive from you.

Information we receive in applications and forms necessary to open an account may include details about your assets, liabilities, tax returns and other financial statements. Information about your past experience with other organizations helps us to determine your objective and hence suitable strategies and investments. The sources may include:

- Information on applications such as name, address, Social Security number, and medical information (if insurance related);
- Information regarding your transactions with us, products or services used, account balances and payment history;
- Information from consumer reporting agencies such as credit relationships;
- Information related to your employer, association or benefit plan sponsor;
- Account and financial statements furnished by you.

### **Limited Disclosure**

LSC does not disclose any nonpublic information about our current, former or potential customers to anyone except as required by law, or required to conduct business. We will share customer information as required to do business with the custodian you designate.

There are certain situations where we may, in good faith, disclose information requested by government agencies to facilitate an audit or examination (state regulatory agency or Securities and Exchange Commission), providing information to facilitate a fraud investigation, or in the proposed or actual sale or merger.

With your consent, we may also disclose your information to organizations and individuals such as attorneys or tax professionals.

### **Employee Access to Customer Information**

LSC trains all employees to adhere to State and SEC policies regarding customer information privacy and security. Only employees having an appropriate business reason will have authorized access to customer information.

We have adopted security standards and procedures to guard against unauthorized access to customer information.

There will be no sharing of information online other than through email correspondence. Due to the technological nature of the Internet, we will take extra steps to prevent disclosure of account numbers when sending information about accounts to you by email.

### **Safeguarding of Information**

LSC has physical, electronic and procedural safeguards to ensure we are complying with our own policy, industry practices and federal or state regulations. Daily backup of client information stored offsite in electronic form. In addition, all data will be archived according to regulatory record retention requirements. All written correspondence will be stored at the place of business, 1200 5<sup>th</sup> Avenue, Suite 1200, Seattle, Washington.

### **Disaster Recovery Plan**

LSC has established an off-site storage and business site should we be prevented from functioning at the office location at 1200 5<sup>th</sup> Avenue, Suite 1200, Seattle, Washington.