

Schulmerich & Associates, LLC Privacy Policy

Effective Date January 1, 2015

Revision 12/21/07

At Schulmerich & Associates, LLC we do everything we can to provide our clients with peace of mind. Our privacy policy applies to anyone who has shared information with us through our website, workshops, or phone and in-person conversations. We know that you have entrusted your financial information to us and we are committed to safeguarding your private information.

Information we collect

We may collect your personal information in a variety of ways depending on the level and type of services Schulmerich & Associates, LLC provides for you. In order to offer the broadest range of services, we may collect the following types of information:

Website usage

We track visitors to our website. This data allows us to provide the best service possible by helping to ensure the health of the network and services, developing and deploying new business services, researching, improving and maintaining our existing business services and providing customized services to our users.

Cookies

When you visit our website we may utilize cookies, which are small files that are placed on your computer. A cookie contains a string of characters to identify your browser and may be used to help provide a more customized user experience. Most internet browsers are set by default to accept cookies, but you may experience some issues using some of the features of our site if you have opted to not accept cookies.

Log files

When you view a website, your browser sends data about your computer system to the web server. Our servers capture this information which may include browser type, time of day, IP address, or cookie and language information.

Links

Our servers keep track of links within our site that you may click on when viewing content. This data is used to better provide content to our users. When clicking on links to other websites you will need to read how their privacy policy will affect you.

Web Forms and Data You Provide to Schulmerich & Associates, LLC

When you complete one of our online forms, we ask for data about you (name, address, email address, etc). This data is design to help our internal staff better meet your needs. We may use, combine, or track this data with other services and features of Schulmerich & Associates, LLC to provide a better user experience and increased functionality. For some services, we may provide the opportunity to opt-out of the combining of such data.

Email submissions

We may keep records of all email communications sent to Schulmerich & Associates, LLC. These emails may be processed and used to provide feedback, answer questions, or service some other request.

Other data

We collect other non-public personal information concerning you in the following ways:

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Information provided by you on applications, contracts or other forms furnished to Schulmerich & Associates, LLC, or through other interactions you have with Schulmerich & Associates, LLC.

- Information arising from your investments in mutual fund accounts managed by Schulmerich & Associates, LLC.

Sharing information

We do not disclose any non-public personal information about our current or former clients to non-affiliated third parties, except as required by law, to ensure compliance with this and other policies, to prevent and detect possible fraud or misuse of services, and to ensure the protection of imminent harm or danger to Schulmerich & Associates, LLC or its employees. For example, we are permitted by law to disclose all of the information we collect, as described above, to the custodian banks of mutual funds you invest in as needed to process your transactions. Furthermore, we restrict access to your non-public personal information to those persons who require such information to provide products or services to you. Some services you receive from Schulmerich & Associates, LLC. are provided through our service providers, which include but are not limited to the custodian banks of mutual funds you invest in. All records containing your non-public personal information are also maintained at the service providers' places of business.

In the event that you hold shares of mutual funds in accounts we manage on your behalf, through a financial intermediary, such as a broker-dealer, bank or trust company, the privacy policy of your financial intermediary would govern how your non-public personal information would be shared with non-affiliated third parties. We may share aggregated usage data with our support vendors and third-party suppliers that do not provide a method to individually track a user, or when we have been provided your explicit consent to share the information with a third party.

Keeping data safe

We maintain physical, electronic and procedural safeguards to protect personal information.

Third-party companies we use to provide outside support services are not allowed to use information about our clients for their own purposes and are contractually obligated to maintain strict confidentiality. We maintain limits on their access to our internal information, only providing that which is necessary to complete the requested services.

Teaming up against identity theft

Identity theft is a serious concern to all of us. Schulmerich & Associates, LLC takes steps to safeguard your information and help protect you from identity theft by:

- never asking for your passwords or account login information via email request;
- utilizing client identification and authentication procedures before initiating transactions;
- creating a secure transmission connection to our websites. You will see a padlock icon and web address beginning with https to indicate the site is secure;
- ensuring our employees are trained to safeguard personal information about you. You can also help protect your identity and accounts. Here are a few steps to remember:
- Schulmerich & Associates, LLC will never request confidential information in a non-secure or unsolicited email communication;
- shred any documents that contain personal information or are requesting you to open an account at a company with which you do not intend to do business;
- regularly check your credit report for unauthorized transactions and activities;
- protect all personal identification numbers (PINs) and website passwords. Do not share this data.

Privacy is not for sale

We do not and will not sell your personal information to anyone, for any reason, at any time.

Policy changes

This policy may change from time to time as necessary or required by law. We will not reduce your rights under this agreement. Most changes should be minor in nature and will be reflected on this site with the date and revision number noted at the start of the policy. In the event the changes are significant in nature, we will provide notification through more prominent placement on the Schulmerich & Associates, LLC website.

If you have any questions or concerns with this policy please feel free to contact us by mail to the following

Address below:

Privacy

c/o Schulmerich & Associates, LLC
10260 SW Greenburg Rd. Suite 400
Portland, OR 97223