

SUMMITRY

Facts	WHAT DOES THE SUMMITRY DO WITH YOUR PERSONAL INFORMATION?
Why	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information — including what we do if your information is ever involved in a security incident. Please read this notice carefully to understand what we do.
What	<p>The types of personal information we collect and share depend on the product or service you have with us. This can include:</p> <ul style="list-style-type: none"> • Social Security number • Income and assets • Investment experience and risk tolerance • Retirement assets • Wire transfer instructions • Account credentials and identifying information <p>Our privacy and security obligations apply to both current and former clients for as long as we retain your information.</p>
How	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Summitry chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Summitry share?	Can you limit this sharing
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	Yes	No
For our marketing purposes- to offer our products and services to you.	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates everyday business purposes- information	No	We don't share
For non-affiliates to market to you	No	We don't share

What We Do	
How does Summitry protect my personal information?	<p>To protect your personal information from unauthorized access and use, we maintain a Written Information Security Policy and an Incident Response Plan. Our safeguards include:</p> <ul style="list-style-type: none"> • Firewall protection, multi-factor authentication, and encrypted communications • Anti-virus, anti-malware, and data loss prevention tools on all firm devices • Secured office access and locked physical filing systems • Employee cybersecurity training upon hire and quarterly thereafter • Written confidentiality agreements with all service providers who access your information • Ongoing third-party security due diligence conducted by our cybersecurity consultant
How does Summitry collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Enter into an investment advisory agreement • Open an account • Seek financial, tax, or investment advice • Tell us about your investment or retirement portfolio • Make deposits or withdrawals from your account
What happens if my information is involved in a security incident?	<p>If there is unauthorized access to or use of your sensitive personal information that could result in substantial harm or inconvenience to you, we will notify you as soon as practicable — and no later than 30 days after we become aware of the incident. We will tell you what happened, what information was involved, and what steps we are taking. This obligation applies to both current and former clients.</p>
Why can't I limit all sharing	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. California residents have additional rights under California law, including the right to opt in before information is shared with non-affiliated third parties.</p>
Definition	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Summitry has no affiliates.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Summitry does not share with non-affiliates so they can market to you.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Summitry doesn't jointly market.