

HEADWATER INVESTMENT CONSULTING, INC.  
PRIVACY POLICY STATEMENT

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Headwater Investment Consulting, Inc. an investment advisory firm, is committed to safeguarding the confidential information of its clients. We do collect personal information in order to open and administer your accounts with us and to provide you with accurate and pertinent advice. We hold all personal information you provide to us in the strictest confidence. We do not disclose information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to change our firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use financial information that you provide to us to help you meet your personal and professional financial goals.

Headwater Investment Consulting, Inc. collects personal information about you from the following sources:

- Applications or other forms.
- Information about your transactions with us or others.
- Information we receive from a consumer reporting agency.

Headwater Investment Consulting, Inc. uses your personal information in the following manner:

- We do not sell your personal information to anyone.
- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advanced notice of the proposed change so you will have the opportunity to opt out of such disclosure.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.