



*Middleton Dickinson*  
*Capital Management LLC*  
Investment Advisor

## Privacy Policy

As a federally registered investment advisor, Middleton & Dickinson Capital Management LLC (“MDCap”) has the responsibility and duty to determine (among other things) the suitability of recommendations made to our clients, comply with securities industry and IRS rules and regulations and in doing so, the firm can and does collect “personal and sensitive information” from and concerning our clients and others we do business with.

We value and protect our clients’ personal and sensitive information and therefore, the firm does not sell client information or client lists, etc. to any third parties.

The firm only shares this information with others “who have a legitimate need to know” for a legitimate business purpose. Generally, the firm defines those as; our business affiliates, regulatory authorities, and on occasion our auditors, or by court order, or to a legitimate law enforcement inquiry.

In other than unusual circumstances, our sharing of your personal or financial information is limited to:

- Financial service institutions such as; mutual fund companies, securities brokers, banks or other financial institutions with which we have business agreements;
- Companies under contract to perform services for our firm such as; tax preparation, data processing, clerical work, etc.

Should we need to supply any third party with your personal or financial information, for any reason such as (but not limited to) tax preparation, we will require a written release from you explaining the matter.

### **Electronic Communication**

Our email is hosted on a secure server. While email can not be guaranteed to be absolutely secured, we recommend that all email which you submit directly to the firm or any our associates, not contain any confidential or sensitive information. Your submission of email to MDCap or any of our associates represents your consent for two-way communication via email. You can at any time opt out of receiving communication via electronic delivery by calling 630.232.2755.

### **Customer Identification**

On 10-26-2001, House Rule #3152 otherwise known as the “Patriot Act” was signed into law. Among other things, this legislation places on all financial institutions the burden and responsibility of positively identifying all of their clients and monitoring of certain types of transactions. Therefore the firm now requires that all new accounts submit a form of corporate identification and/or an approved form of government issued photo identification such as a driver’s license or passport. This form of identification must be current and valid. Additionally, we wish to make you aware in accordance with the provisions of this act, greater scrutiny may be given to money and security transfers of all sorts.

### **Concerns or Updates**

If you have any concerns about the personal or financial information maintained by MDCap, or you wish to update that information, please call Middleton Dickinson Capital Management LLC at 630.232.2755

Annual notification of this policy will be made via statement notice and/or separate mailing.

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