Millard & Company
Privacy Policy

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our clients are confident that we will manage their financial affairs expertly and confidentially.

Millard & Company collects personal, private information from its clients in order to determine the client's specific investment goals and objectives, which will assist in determining how to adequately service the client account based on the services provided by Millard & Company as disclosed in Form ADV Part II and Schedule F.

The safeguarding of customer information is an issue we take seriously, and we want to assure all of our clients that whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles, which are designed to guide us in serving the privacy needs of our customers.

1. **Recognition of a Client's Expectation of Privacy**: At Millard & Company, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our client's trust. Thus, the safekeeping of customer information is a priority for us.

2. **Use, Collection, and Retention of Client Information**: Millard & Company limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, annual income and net worth.

3. **Maintenance of Accurate Information**: Millard & Company recognizes that it must maintain accurate customer records. The above referenced information is collected at the inception of your relationship with Millard & Company. Thereafter, we will contact you periodically to review your overall account holdings, and to ensure the personal/confidential information contained in your file is accurate. Millard & Company also requests that you review any information provided to you related to your advisory account, either by Millard & Company or your account custodian, and notify Millard & Company promptly on the discovery of erroneous information. Millard & Company will respond to a comment/request to correct inaccurate information immediately.

4. **Limiting Employee Access to Information:** At Millard & Company, employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the

importance of these issues, all Millard & Company employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.

5. **Protection of Information via Established Security Procedures:** Millard & Company recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, Millard & Company has established appropriate security standards and procedures to guard against any unauthorized access to client information.

6. **Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Millard & Company places strict limits on who receives specific information about client accounts and other personally identifiable data. Millard & Company may share information with such companies if they provide a product or service that may benefit our clients. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value.

   We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our clients; in the normal course of our business (for example, with client reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of the client.

7. **Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

8. **Disclosure of Privacy Principles to Clients:** Millard & Company recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles, which are made readily available. Clients who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Andrew Millard at 828.859.7001 or via e-mail at andy@low-stress-investing.com.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time. Under such circumstances, we will provide you with an updated set of our policies, and will provide adequate time for you to opt out of any information sharing arrangement. Please note that these Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.