

## **LAWRENCE W. KELLY & ASSOCIATES, INC. PRIVACY POLICY**

Lawrence W. Kelly & Associates, Inc. ("LKA Investment Counselors" or "LK&A") recognizes the importance of maintaining its clients' privacy, and we have adopted strict policies and procedures to protect your personal information. We treat all of the personal and financial information that you share with us in the course of our providing you with investment advisory services as confidential and recognize the importance of protecting your information from disclosure.

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. The law permits us, and it is necessary in servicing your account, to disclose information for purposes of executing securities transactions on your behalf and in connection with the custody of your securities.

In the process of providing you services, we collect nonpublic personal information about you from the following sources:

- Information we receive from you in your advisory contract with us;
- Information you have provided to us in your custodian's account forms;
- Information we collect as part of the process of providing individualized investment advisory services for you; and
- Information about your securities transactions that we perform on your behalf or of which you give us information.

We restrict access to non-public personal information about you to those employees who need to know that information to provide advisory services to you. We maintain physical, electronic, and procedural safeguards to comply with federal standards to guard your non-public personal information.

Nonpublic personal information includes substantially all the information about you that is collected by us. This would include information that identifies you such as name, birthday, social security numbers, location data and account identifiers

Lk&A reserves the right to disclose private, personal and confidential information where we believe in good faith that disclosure is required either under law or to cooperate with regulators or law enforcement authorities. In addition, we may disclose Personal Information to a non-affiliated third party upon the owner's written request.

Clients have the ability to opt out of some disclosures of non-public personal information to nonaffiliated third parties. If you have any questions about this opt out provision, our privacy policy or any other aspect of your relationship with us, please feel free to call us at (626) 449-9500.