

# **Privacy Notice to Our Clients**

THIS NOTICE IS FOR YOUR INFORMATION. NO RESPONSE IS REQUIRED.

**The CLEVER Group, LLC** strongly believes in protecting the confidentiality and security of information we collect about you. In this notice, "we" refers to The CLEVER Group, LLC and its employees. This notice describes our privacy policy and describes how we treat the information we receive ("Information") about you.

**Why We Collect and How We Use Information:** We collect and use Information for business purposes with respect to our relationships involving you. These business purposes include financial planning in all of its aspects, investment management, advising our clients, processing transactions requested by them, and income tax return preparation. We may also use Information to offer you other services we provide.

**How We Collect Information:** We get most Information directly from you. The Information that you give us when applying for our services generally provides the Information we need. Information collected may relate to your finances, employment, health, avocations or other personal characteristics as well as transactions with us or with others.

**How We Protect Information:** We treat Information in a confidential manner. Our employees are required to protect the confidentiality of Information. Employees may access Information only when there is an appropriate reason to do so, such as to administer or offer our services. We also maintain physical, electronic and procedural safeguards to protect Information; these safeguards comply with all applicable laws. Employees are required to comply with our established policies.

**Information Disclosure:** We may disclose any Information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, information may be disclosed to others to enable them to provide business services for us, such as performing general administrative activities for us, and assisting us in processing a transaction requested by you. Information may also be disclosed for audit or research purposes; or to law enforcement and regulatory agencies, for example, to help us prevent fraud. We do not make any other disclosures of Information to other companies who may want to sell their products or services to you. For example, we will not sell your name to a catalog company. If we wish to ask you for a reference, we will contact you and receive your prior permission each time.

**Access to and Correction of Information:** Upon your written request, we will make available Information for your review. If you notify us that the Information is incorrect, we will review and correct it.

The CLEVER Group will notify you in advance if our privacy policy is expected to change. The CLEVER Group is required by law to deliver this *Privacy Notice* to you annually, in writing.