

## **Snow Creek Wealth Management's Privacy Policy**

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Snow Creek Wealth Management, LLC (Snow Creek) does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law. Snow Creek is committed to safeguarding the confidential information of its clients. Snow Creek holds all personal information provided by clients in the strictest confidence and it is the objective of Snow Creek to protect the privacy of all clients. Except as permitted or required by law, Snow Creek does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, Snow Creek will provide clients with written notice and clients will be provided an opportunity to direct Snow Creek as to whether such disclosure is permissible. To conduct regular business, Snow Creek may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Snow Creek
- Information about the client's transactions implemented by Snow Creek or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Snow Creek to provide access to customer information within the firm and to nonaffiliated companies, such as Charles Schwab & Company, Inc., with whom Snow Creek has entered into agreements with. Snow Creek may from time to time share client information with its affiliated accounting firm, Goldstein/Sacks & Associates, Inc., P.C. Due to the nature of our organization, Snow Creek does share resources and office space with Goldstein/Sacks & Associates, Inc., P.C. While we have implemented procedures to limit your personal information to only those employees that need to know such information to provide you services, in the normal course of business, Goldstein/Sacks & Associates, Inc., P.C. employees do come into contact with your personal information. Snow Creek may also provide your information to vendors providing data processing; computer software maintenance and development; compliance and legal consulting; and other general business consulting services. These vendors are required to sign a nondisclosure agreement agreeing to maintain the confidentiality of all non-public personal information. To provide the utmost service, Snow Creek may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Snow Creek's behalf.

- Information Snow Creek receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with Snow Creek or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Snow Creek

Since Snow Creek shares nonpublic information solely to service client accounts, Snow Creek does not disclose any nonpublic personal information about Snow Creek's customers or former customers to anyone, except as permitted by law. However, Snow Creek may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Snow Creek has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Snow Creek will allow its clients the opportunity to opt out of such disclosure.

### **Acknowledgment of Receipt Privacy Notice:**

I hereby acknowledge receipt of Snow Creek Wealth Management's Privacy Notice

Client Name \_\_\_\_\_

Client Signature (both if joint account) \_\_\_\_\_ Date \_\_\_\_\_