

PRIVACY POLICY

Protecting our clients' privacy is of paramount importance to **Oatley & Diak, LLC** ("Advisor"). It is **Oatley & Diak, LLC** policy that no private client financial information obtained by us is sold or made available to third parties except that:

- Third parties may be used by Advisor to assist in the management or maintenance of client accounts (such as a client's custodian);
- Client information may be released to client's accountancy, legal and other third party representatives at client's direction;
- Client information may be released in accordance with applicable laws and regulations.

We will not share nonpublic personal information about our clients with nonaffiliated third parties without prior client consent, except for specific purposes described below. This notice explains our collection, use and safeguarding of client information.

Information we collect

The personal information we collect directly from you includes information required to communicate with you and assist us in effectively addressing your financial needs. This information could include:

- Your name and address
- Investment objectives and experience
- Financial circumstances
- Account balance and account transactions
- Social security number
- Employment information

We may collect your personal information, for example, from the following sources:

- Information we receive from you on applications and other forms
- Information about your transactions with us or others

We also collect your personal information from others such as custodians, broker/dealers and other companies.

How information is used

All financial companies need to share client personal information to run their everyday business. We use information about you to provide our asset management services to you. We may disclose the information to third parties as permitted by law, including the broker/dealers, custodians or other companies used to provide services to you. From time to time, we may be required to give information about our business to regulatory authorities or as required by law. This may include personal information about you. We do not sell your personal information to anyone.

How information is safeguarded

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of your information. These include confidentiality agreements with companies we hire to help us provide services to you, password-protected user access to our computer files, training of employees, and strict confidentiality policies that apply to all employees.

We reserve the right to change this policy at any time as needed and you will be notified if any changes occur. The examples in this Privacy Policy are illustrations, and they are not intended to be exclusive.