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# Privacy Policy

Donnelly Investments recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Donnelly Investments will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

## **Why We Collect Your Information**

We gather information about you so that we can:

- help design and implement the investment and financial planning-related services we provide you; and
- comply with the federal and state laws and regulations that govern us.

## **What Information We Collect and Maintain**

We may collect the following types of “nonpublic personal information” (“NPI”) about you:

- information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information;
- information that we generate to service your financial needs; and
- information that we may receive from third parties in connection with the services we provide.

## **What Information We Disclose**

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. Donnelly Investments may disclose the client’s NPI: (1) to individuals and entities not affiliated with Donnelly Investments, including but not limited to third parties that assist in the supervision or management of your account(s) (i.e., sub-advisers, account custodian, record keeper, attorney, etc.); (2) to service providers contracted by us in order for us to perform the duties in furtherance of the client’s engagement with

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Donnelly Investments (i.e., client management systems, archiving technology vendors, cloud service providers, etc.); (3) to your authorized representative or power of attorney; (4) when we receive your prior consent; (5) in connection with a proposed or actual sale, merger, or transfer of all or a portion of our business; and (6) as otherwise permitted to do so in accordance with the parameters of applicable federal and state privacy regulations.

If Donnelly Investments has a change to its privacy policy that would allow it to disclose non-public information not covered under applicable law, Donnelly Investments will allow its clients the opportunity to opt-out of such disclosure.

### **How We Protect Your Personal Information**

Privacy has always been important to Donnelly Investments. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with Donnelly Investments will be subject to confidentiality agreements.

### **Former Clients**

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

### **Contact Us**

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Thomas Donnelly, Chief Compliance Officer of Donnelly Investments. Please contact Thomas at 323-304-9297.