

## **Spire Investment Partners, LLC Privacy Policy**

### **Collection and Retention of Non-Public Personal Information**

Spire Investment Partners, LLC, its affiliates, Spire Securities, LLC, Spire Wealth Management, LLC and Spire Insurance Agency, LLC collectively referred to here as "Spire".

Spire collects and retains information about you to identify and communicate with you, to provide you with our products and services, to help us respond to your questions and to inform you about other financial services that may be of interest to you.

### **We collect the following types of non-public personal information about you:**

Information that we receive from you on applications or other forms. This information can include:

- Social Security number
- Account numbers and account balances
- Information about your transactions with us or others

### **Disclosure of Non-Public Personal Information to Non-Affiliated Third Parties**

We do not disclose non-public personal information about you or our former customers to non-affiliated third parties, except as permitted by law. We do not sell your personal information to anyone.

### **Disclosure of Non-Public Personal Information in Other Circumstances**

We may also disclose non-public personal information about you as necessary to effect, administer, or enforce transactions that you have requested or authorized, or in connection with servicing or processing a financial product or service you have requested or authorized, or to maintain or service your accounts with us, or as otherwise described below. The law allows you to "opt out" of only certain kinds of information sharing with third parties. Spire does not share personal information about you with any third parties that triggers this opt out right.

We normally disclose information:

- When it is necessary or helpful in completing a transaction;
- To verify the existence and condition of your account for a third party, such as another financial institution;
- To comply with a law, regulation, legal process, or court order which applies to us or to an affiliate;
- When you authorize us to;
- To other companies, financial institutions and networks which may be involved in processing your transactions;
- To our agents and affiliates and to third parties who perform services or functions on our behalf to facilitate the delivery of information related to your accounts or to other financial services that may be of interest to you;
- In response to requests by our regulatory agencies.

### **Our Employees' Access to and Use of Customer Information**

Each of our employees and representatives has responsibility for maintaining the confidentiality of customer information. We restrict access of nonpublic information about you to those employees who need to know that information to provide products and services to you. We require all of our employees to agree in writing to protect the confidentiality of customer information and to use it only for business purposes.

### **Our Security Procedures**

We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Spire is firmly committed to maintaining our clients' privacy in the Internet world.

If clients choose to contact Spire via e-mail, we will use e-mail information only for the specific purpose of responding to requests or comments, and providing information to clients. E-mail addresses will not be sold, nor will they be shared with others outside of Spire, unless we are compelled to do so by law.

### **Maintaining Confidentiality in Our Business Relationships with Other Companies**

From time to time we contract with other businesses to perform services in support of our products. When it is necessary to provide confidential customer information to a third party, we require each business that we select to agree to adhere to the same privacy standards, laws and regulations that apply to us.