

## Privacy Notice

Keats, Connelly and Associates, LLC (“KeatsConnelly”), and its wholly-owned subsidiary, Cross Border Tax & Accounting, LLC (“CBTA”), strive to maintain your trust and confidence. We also understand that clients value their privacy, and our firms maintain physical, electronic, and procedural safeguards that comply with federal standards to protect our clients’ non-public personal information (“information”). Through this policy and our underlying procedures, KeatsConnelly and CBTA seek to secure the confidentiality of client records and information and protect against anticipated threats or hazards to the security or integrity of client records and information.

We have several affiliated financial firms, and as a matter of policy, we do not share personal client information among affiliates for marketing purposes. It is the policy of KeatsConnelly and CBTA to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide services to the client. KeatsConnelly and CBTA may disclose a client’s information if KeatsConnelly or CBTA is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with KeatsConnelly or CBTA, including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by KeatsConnelly or CBTA in order to facilitate the commencement/continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by a client for KeatsConnelly or CBTA (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

KeatsConnelly and CBTA permit only authorized employees and affiliates who have signed a copy of the KeatsConnelly/CBTA Privacy Policy to have access to client information. Employees violating the KeatsConnelly and CBTA Privacy Policy will be subject to disciplinary processes by KeatsConnelly or CBTA’s. Additionally, whenever KeatsConnelly or CBTA hire other organizations to provide services to KeatsConnelly or CBTA for clients, KeatsConnelly or CBTA will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, or want to limit any sharing of your personal information, please contact Dale A. Walters, CEO and Chief Compliance Officer, of KeatsConnelly, at (602) 955-5007.