

FACTS

What Does Exchange Capital Management, Inc. Do With Your Personal Information?

The Law

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

Our Policy

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Income
- Employment and residential information
- Social security number
- Cash balance
- Security balances
- Transaction detail history
- Investment objectives, goals, and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

Your Rights

All financial companies need to share customers' personal information to run their everyday business. We list below the reasons financial companies can share their customers' personal information; the reasons Exchange Capital Management chooses to share; and whether you can limit this sharing.

Definitions

Everyday Business Purposes	The actions necessary by financial companies to run their business and manage customer accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you.
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Exchange Capital Management does not have any affiliates.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Exchange Capital Management does not share information with non-affiliates for marketing purposes.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Exchange Capital Management does not engage in joint marketing with non-affiliates.

Reasons we can share your personal information	Does Exchange Capital Management share?	Can you limit this sharing?
For our everyday business purposes—such as to provide advice, process your transactions, and maintain your account(s)	Yes	No
For our marketing purposes—to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes—information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes—information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For non-affiliates to market to you	No	We do not share
Contact Us	Call Exchange Capital Management at 734-761-6500	

Sharing Practices	
How often does Exchange Capital Management notify me about their practices?	We must notify you about our sharing practices when you open an account and each year while you are a customer.
How does Exchange Capital Management protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Exchange Capital Management collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • establish an investment advisory relationship • contract for financial planning services • open an account or deposit money with custodians • purchase or sell securities with executing broker-dealers <p>We also collect your personal information from others, such as custodians, broker-dealers, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit sharing only for</p> <ul style="list-style-type: none"> • affiliates' everyday business purposes—information about your creditworthiness • affiliates to market to you • non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

If you would like a copy of the Exchange Capital Management Form ADV Part 2A and 2B, please send a written request to:

Exchange Capital Management, Inc.
303 Detroit Street, Suite 203
Ann Arbor, Michigan 48104

If you wish to modify or impose reasonable restrictions concerning the management of your account, or if your financial situation, investment objectives, or risk tolerance have changed, please contact your Exchange Capital Management investment advisor representative or contact the firm's CCO at 734-761-6500. We will contact you at least annually to determine if your investment goals, objectives, and risk tolerance have changed.

We urge that you advise us immediately if you have not received your custodian or brokerage statement, which is required to be delivered to you no less frequently than quarterly. In addition, please compare any account information provided by us with account statements from your broker-dealer or custodian and to advise us of any discrepancies. The official record of your account is maintained by your broker-dealer or custodian. Thank you.