

## **Exchange Capital Management, Inc. Regulation S-P Privacy Policy**

- 1. We do not sell your personal information to anyone.**
- 2. We do not disclose personal information to third parties, unless one of the following limited exceptions applies.**
  - ☐ We may disclose personal information to companies that help us process or service your transactions or account(s), including companies that print and mail your account statements.
  - ☐ So that you can learn about products or services that may be beneficial, we may disclose personal information, such as aggregate account and transaction data, to companies, including financial institutions, which assist us in marketing. We will require these companies to refrain from using your personal information for their own purposes.
  - ☐ We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, or for institutional risk control.

**Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so, that is, opted-in.**

- 3. We do collect personal information in the normal course of business in order to administer your accounts and serve you better.**
  - ☐ Application and registration information. We collect information that you provide to us when you execute an investment advisory agreement or request that we prepare a financial plan on your behalf. The information we collect may include name, address, phone number, email address, social security number, and information about your interests, investments, and investment experience.
  - ☐ Web site usage. We collect information on our Web site through the use of "cookies". For example, we may identify the pages on our Web sites that your browser requests or visits. This information is only personally identifiable if you have voluntarily chosen to identify yourself; for example, by scheduling an appointment with one of our financial professionals, inquiring about employment opportunities, or registering to receive our investment strategy or other similar research published by Exchange Capital Management, Inc.
  - ☐ Transaction information. Once you have an advisory relationship with us, to administer your account(s) and better serve you, we collect and maintain personal information about your transactions, including balances, positions, and history, and may include your name or other data in an internal client list that reflects your investment activities.
- 4. We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.**
- 5. We protect the confidentiality and security of your personal information.**
  - ☐ We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information.
  - ☐ We maintain physical, electronic, and procedural safeguards to guard your personal information.
  - ☐ Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality.
- 6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**
  - ☐ If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.
- 7. We will provide advance notice of changes in our information-sharing practices by posting this policy to our website not less than 21 days prior to any change taking effect.**