

# Privacy Policy

The Securities and Exchange Commission (SEC) was required by the Gramm-Leach-Bliley Act to establish standards to safeguard client information and records. As a result, the SEC adopted Regulation S-P which, among other things, requires investment advisers registered with the SEC to adopt appropriate policies and procedures that address safeguards to protect this information and to disclose its privacy policies to clients.

Petersen Hastings has always taken great measures to protect and safeguard information we gather on our clients. As part of this new SEC regulation we are required to give you this notice concerning our privacy policy.

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms
- Information about your transactions with us or others

We do not disclose any nonpublic personal information about you to third parties, unless one of the following limited exceptions applies or you have specifically asked us to do so:

- We disclose personal information to companies that help us process or service your transactions or accounts (such as TD Ameritrade Institutional, TD Ameritrade Trust, Charles Schwab & Co., National Advisors Trust Company or others as applicable).
- We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law, for example, to cooperate with regulators or law enforcement authorities.
- We may use your personal email address for communication of Petersen Hastings' electronic media, such as newsletters, articles, etc.

Petersen Hastings restricts access to your personal and account information to those employees who need to know that information in order to provide investment advisory services to you. We maintain physical, electronic and procedural safeguards to guard your personal financial information.

If you should ever decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice.

Should you have any questions about the privacy and protection of your records, please contact us and we will be happy to discuss this matter with you.

