

HELM INVESTMENT MANAGEMENT, LLC
2012 PRIVACY and ADV POLICY

Registered Financial Advisors (“RIA”), like all providers of personal financial services, are required by law to inform their clients of their policies regarding privacy of client information. RIA’s have been, and continue to be, bound by professional standards of confidentiality that are even more stringent than those required by law. Therefore, we have always protected your right to privacy.

Types of Nonpublic Personal Information We Collect

We collect nonpublic personal information about you that is provided to us by you or obtained by us with your authorization.

Parties to Whom We Disclose Information

For current and former clients, we do not disclose any nonpublic personal information obtained in the course of our practice except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees, and in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared.

Protecting the Confidentiality and Security of Clients’ Information

We retain records relating to professional services so that we as part of our business and, in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

ADV Part II

Regulations require all registered investment advisers to annually offer their disclosure documents to clients. If you would like copy of our most recent ADV Part II, please call either Jay McCormick or Tom Barrett at (303) 861-4835. The Helm ADV Part II is also posted and available on our website at www.helminvest.com.

Please call if you have any questions, because your privacy, your understanding of our business, our professional ethics, and the ability to provide you with quality financial services, are very important to us.

Helm Investment Management, LLC.

Thomas Jay Barrett, Jr.