

## **Notice of Privacy Policy**

Helm Investment Management LLC (Helm) is committed to safeguarding the personal information of our customers. This notice will help you understand how we safeguard and utilize the information we collect.

### **Why and How We Collect Personal Information**

We collect information that assists us in servicing your financial needs. This information helps Helm provide you with a high standard of customer service, process your transactions, and fulfill state and Federal legal and regulatory requirements. The personal information we collect includes information collected on account applications and related forms such as the client(s)' name, address, social security number, bank account number(s), and employment information.

### **How We Protect Information**

Our employees and third party vendors maintain and protect the confidentiality of your personal information by utilizing physical, electronic and procedural safeguards.

### **Disclosure of Information**

We only disclose non-public client information to nonaffiliated third parties without prior client consent when we believe it necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;
- To perform services for the firm or on its behalf to develop or maintain software;
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of our business;
- To help us prevent fraud;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- To comply with federal, state or local laws, rules and other applicable legal requirements.

Except in these specific, limited situations, we will not make any disclosures of your personal information to other companies who may want to sell their products or services to you.

### **Former Customers**

This policy applies to former customers as well as current customers.

### **Maintaining Accurate Information**

Helm strives to maintain complete and accurate information on you and your accounts. We will give you reasonable access to the information we have about you. If you have a question or concern about your personal information or this privacy notice, please contact us.

### **Further Information**

We reserve the right to change this Privacy Policy. The examples contained in this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with Federal law and SEC regulations regarding privacy.