# HELM INVESTMENT MANAGEMENT, LLC PRIVACY POLICY and ADV AVAILABILITY

Registered Investment Advisory firms ("RIA"s), like all providers of personal financial services, are required by law to inform their clients of their policies regarding privacy of client information. RIAs have been, and continue to be, bound by professional standards of confidentiality that are 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 prospective, 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 as part of our business and, in some cases, to comply with professional and regulatory guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards. Please refer to the document "How Helm Investment Management Protects Your Confidential Information."

#### **ADV Part II**

Regulations require all RIAs to annually offer their disclosure documents to clients. If you would like copy of our most recent ADV Part II, please call Jay McCormick, Peter Quinn, or Tom Barrett at (303) 861-4835. The Helm ADV Part II is also posted to the Security and Exchange Commission's web site (<a href="www.sec.gov">www.sec.gov</a>), and is available on our website at <a href="www.helminvest.com">www.helminvest.com</a>.

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.

Jay A. McCormick Peter J. Quinn