

## Charter Capital Management (CCM) Privacy Policy

Protecting your privacy is important to Charter Capital Management, Inc. and we want you to understand what information we collect, how we use it and how you are protected. The information we handle is highly sensitive and we take every precaution to protect it. Our procedures comply with state and federal regulations to ensure your personal information is safe.

## How and Why We Obtain Personal Information

CCM uses personal information collected about you in order to meet the stated objectives in your investment portfolio, process transactions in your account and respond to your inquiries. CCM may collect nonpublic personal information about you from any of the following sources:

- Information we receive from you on applications or forms (examples include name, address, Social Security number, birth date, assets and income)
- Information about your transactions with us or others (for example, trade history, account balances or from other institutions if you transfer an account to CCM)
- Information from your interactions with CCM (such as by mail, e-mail or telephone)

## **How We Protect Your Information**

CCM views privacy as a sensitive issue and a top priority. We restrict access to nonpublic personal information about you to only those employees who need to know that information to provide products and services to you. We maintain physical, electronic and procedural safeguards that comply with state and federal standards to guard your nonpublic personal information. Furthermore, we do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

Charter Capital Management, Inc.