

# Kobren Insight Management Privacy Statement



## Client Privacy Statement

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The creation of this Statement and its periodic dissemination to our clients is required by the Securities & Exchange Commission Regulation S-P.

### Privacy is our priority.

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We are committed to protecting consumers' personal and financial information. In the course of providing our personalized advisory services, we need to collect and maintain certain nonpublic personal information. We limit the collection of nonpublic personal information to what is necessary in delivering our services to consumers. This Privacy Statement answers some questions about what nonpublic personal information we collect, what we do with it, and how we protect it.

We do not disclose any nonpublic personal information about consumers to any nonaffiliated third parties, except as described below.

### What types of nonpublic personal information do we collect?

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We may collect the following types of nonpublic personal information:

- Information you provide on applications or other forms, or through discussions we have with you or your representatives, such as your name, address, Social Security number, date of birth, income, employment information, investment experience, and risk tolerance, and any information about your personal goals or objectives.
- Information about your transactions with or through us, such as your account balance, trading activity and account history, if applicable.

### What types of nonpublic personal information, and to whom, do we disclose (other than those companies used to process or service transactions, or as permitted by law)?

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We may disclose the above types of nonpublic personal information to third parties as necessary to conduct business with you. We may disclose nonpublic personal information to nonaffiliated third parties as permitted by or required by law, or to cooperate with regulators or law enforcement authorities. These parties include government/regulatory organizations, such as the Internal Revenue Service (IRS) and the Securities and Exchange Commission (SEC), as well as any of the securities exchanges, self-regulatory organizations and states we are registered with and to parties under court order or subpoena that request this information. We may also disclose nonpublic personal information to nonaffiliated third parties for which you have provided your consent or you have directed us to make the disclosure.

We do not sell your nonpublic personal information to any entity. We do not share your nonpublic personal information with any third parties for marketing purposes. We do not disclose nonpublic personal information about former customers to anyone, except as permitted by law or to cooperate with regulators or law enforcement authorities.

We require that all entities with which we share your nonpublic personal information, including companies that process or service transactions for us, agree to keep your information confidential. We also prohibit them from using or disclosing your nonpublic personal information except for the limited purpose and to the persons for whom disclosure was intended, or as otherwise permitted by law.

### What opt-outs of disclosure are available and how can they be exercised?

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The law allows you to opt-out of our sharing nonpublic personal information about you in certain circumstances with nonaffiliated companies; that is, you may direct us to not make such disclosures. We do not currently share information about you with any nonaffiliated third party that triggers this opt-out right. Therefore, there is no need for you to opt-out of such sharing with nonaffiliated third parties. If in the future we desire to disclose your information in a way that is inconsistent with this policy, we will notify you in advance and provide you with the opportunity to opt-out of such disclosure.

The law also allows you to opt-out of our sharing of nonpublic personal information and eligibility information about you in certain circumstances, including for marketing purposes, with affiliated companies. We do not currently share such information about you with our affiliates that would trigger this opt-out right. Therefore, there is no need for you to opt-out of such sharing with nonaffiliated third parties. If in the future we desire to disclose such information in a way that is inconsistent with this policy, we will notify you in advance and provide you with the opportunity to opt-out of such disclosure.

### How do we protect the confidentiality and security of nonpublic personal information?

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We maintain physical, electronic, and procedural safeguards that meet or exceed industry standards to guard your nonpublic personal information. Our firm's policy requires that employees with access to confidential information may not disclose or otherwise use the information except for business purposes.

We conduct regular internal audits of our business practices and procedures, examining confidentiality standards and information access in order to protect your personal information. Access to client information is restricted to our employees, representatives, and agents with a business reason for access to such information.

Keeping client account information accurate and up to date is very important to us. If you ever find that your account information is incomplete, inaccurate or not current, please contact us:

Kobren Insight Management, Inc., 20 William Street, Ste. 200, Wellesley Hills, MA, 02481. Or call: (800) 586-4727

For questions regarding our Privacy Statement, please call us.