

NOTICE OF PRIVACY POLICY

Townsend Asset Management Corp. is committed to keeping the personal information collected from our potential, current and former clients confidential and secure. The proper handling of personal information is one of our highest priorities. We want to be sure you know why we collect personal information from you and to explain our commitment to protect the information you provide to us.

Personal Information—We collect and keep only information that is necessary for us to provide services requested by you and to administer your business with us. We may collect nonpublic personal information such as your name, address, social security number, assets, income and any medical information that you authorize us to collect for insurance purposes.

We may collect this information when you complete our financial questionnaires or applications to open accounts with brokerage firms, mutual funds, etc., apply for insurance products or obtain tax preparation, financial planning or investment advisory services from us. It may also be collected as a result of transactions with us, our affiliates, representatives, product or services providers, or others. This could include account numbers, account balances, parties to transactions, and transactions completed by us.

Our Use of Your Personal Information—Within our firm, only employees or representatives with a valid business reason have access to your personal information. These individuals are educated on the importance of maintaining the confidentiality and security of your information. We use your information strictly to provide you with the services and financial products you have requested from us.

Non-Affiliated Parties—We do not share your nonpublic personal information with non-affiliated parties (companies or individuals not affiliated with us) except as permitted by law and for the limited purposes of effecting transactions or services requested and authorized by you or to comply with legal or regulatory requirements.

Examples: If we open a brokerage account for you it is necessary to provide the brokerage firm with certain personal information. When coordinating with your tax or legal advisors, it may be necessary to discuss certain personal information with them.

In the normal course of our business we may utilize non-affiliated parties to provide us with service functions, such as record keeping, data storage, etc. We require these providers to agree to safeguard your information, to use the information only for the intended purpose, and to abide by applicable law.

Protection & Maintenance of Information—We maintain standards to protect your personal information, whether written, spoken, or electronic. Our goal is to maintain accurate, up-to-date client records in accordance with industry standards. We attempt to keep information current and complete, including timely correction of any inaccurate information.

Disclosure of Privacy Policy—We recognize and respect the privacy concerns of our potential, current and former clients. We strive to safeguard your personal information. We provide a Notice of Privacy Policy for informational purposes and update and distribute it as required by law.