Elephant Corner Financial

NAVIGATING YOUR FINANCIAL WORLD ONE CORNER AT A TIME

Privacy Policy

Elephant Corner Financial LLC

CRD No. 330000

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www.elephantcornerfinancial.com

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Introduction

We recognize our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. We will not sell your personal information.

Federal and state laws give you the right to limit some but not all sharing. We want you to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so we can help design and implement the investment and financial planning related services we provide you and to comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of "nonpublic personal information" about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information we generate to service your financial needs.
- Information we may receive from third parties, such as the custodian who holds your account(s).

What Information We Disclose

All financial companies need to share their clients' personal information to run their business. To provide our advisory services to you, it is necessary for us to share your information in the following circumstances:

- With your account custodian to manage your account and execution transactions.
- With companies that provide software or website applications we use to provide our services or manage our business, such as financial planning software, portfolio management software, client relationship management solutions, invoicing and payment processors, or records retention web services.
- In the event of the death or incapacity of our firm's principal, your information may be shared with our designated agent to carry out our business succession plan.
- We may also be required to produce information regarding our clients to law firms, law enforcement, or government agencies in response to legal or regulatory inquiries, such as subpoenas or regulatory examinations, or as necessary to prevent fraud, financial exploitation, or illegal activities.

Under Vermont law, before we can share your nonpublic personal information with non-affiliated third parties other than as necessary to provide our advisory services, we must obtain your written consent to "opt-in" to such sharing. If we change our policies in the future, we will obtain your written consent before sharing your nonpublic personal information with any unaffiliated third parties. How We Protect Your Personal Information

Privacy has always been important to us. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. When sharing information with unaffiliated parties as permitted and as described above, we perform due diligence to review their privacy, confidentiality, and/or cybersecurity policies, as applicable.

Former Clients

After you cease to be our Client, we are required to maintain certain nonpublic information about you to comply with applicable Federal and State regulations. Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

Contact Us

You are encouraged to discuss any questions regarding our privacy policies and procedures directly with Neven Kraguljevic, Chief Compliance Officer at (401) 271-1767 or compliance@elephantcornerfinancial.com, or visit our website at www.elephantcornerfinancial.com for further information.