

THE WEALTH COUNSELOR LLC PRIVACY STATEMENT

We Are Committed to Safeguarding Client Information

A fundamental principle in the client-lawyer relationship is that, in the absence of the client's informed consent¹, the lawyer must not reveal information relating to the representation. This contributes to the trust that is the hallmark of the client-lawyer relationship. The client is thereby encouraged to seek legal assistance and to communicate fully and frankly with the lawyer even as to embarrassing or legally damaging subject matter. The lawyer needs this information to represent the client effectively. Almost without exception, clients come to lawyers in order to determine their rights and what is, in the complex of laws and regulations, deemed to be legal and correct. Based upon experience, lawyers know that almost all clients follow the advice given, and the law is upheld.

The Wealth Counselor LLC recognizes that our relationship with you is based on integrity and trust. We work hard to maintain privacy. We are very careful to preserve the private nature of our relationship with you. In order to serve your needs now and in the future, we may ask you to provide us with certain information. We understand that you may be concerned about what we will do with such information – particularly any personal or financial information. Consequently, The Wealth Counselor LLC has adopted this Privacy Policy to govern the use and handling of your personal information.

Applicability

This Privacy Policy applies not only to matters communicated in confidence by you but also to all information relating to the representation, whatever its source.

A lawyer is prohibited from revealing information relating to the representation of a client. This prohibition also applies to disclosures by a lawyer that do not in themselves reveal protected information but could reasonably lead to the discovery of such information by a third person. A lawyer's use of a hypothetical to discuss issues relating to the representation is permissible so long as there is no reasonable likelihood that the listener will be able to ascertain the identity of the client or the situation involved.

This policy applies in judicial and other proceedings in which a lawyer may be called as a witness or otherwise required to produce evidence concerning a client. A lawyer may not

¹ Authorized Disclosure: Except to the extent that the client's instructions or special circumstances limit that authority, a lawyer is impliedly authorized to make disclosures about a client when appropriate in carrying out the representation. In some situations, for example, a lawyer may be impliedly authorized to admit a fact that cannot properly be disputed or to make a disclosure that facilitates a satisfactory conclusion to a matter. Lawyers may, in the course of the representing a client, disclose to other lawyers assisting in that representation information relating to a client, unless the client has instructed that particular information be confined to specified lawyers.

disclose such information except as authorized or required by the Rules of Professional Conduct or other law.

The duty of confidentiality continues after the client-lawyer relationship has terminated.

Types of Information

At the same time, the very nature of our practice requires that we collect or share certain information about you with others. As such, we want to be aware of how we handle and protect your personal information. Our policies and procedures for collecting and disclosing personal information are detailed below.

We may collect non-public personal information about you from:

- Applications or other forms, and in other communications to us, whether in writing, in person, by telephone or by any other means;
- Consumer or other reporting agencies, medical or health care providers, government agencies, employers or others;
- Your transactions with us, our affiliates, or others; and
- Our Internet website

We require anyone with whom we share your personal information to protect it. We also require that they use it solely for the purpose for which it was shared.

Use of Information

We request information from you to assist us in providing legal counsel to you. Therefore, we will not release your information except: (1) as necessary for us to provide the product or service you have requested of us; or (2) as required by law. We may, however, store such information indefinitely, including the period after which any customer relationship has ceased. Such information may be used for any internal purpose, such as quality control efforts or customer analysis. We may also provide nonpublic personal information listed above to one or more of our affiliated financial professionals, **as you may specifically authorize us to do to enhance our representation of you.** Such affiliated financial professionals include financial service providers, such as tax attorneys, insurance professionals, and trust and investment advisors.

Acting Competently to Preserve Confidentiality

A lawyer must act competently to safeguard information relating to the representation of a client against inadvertent or unauthorized disclosure by the lawyer or other persons who are participating in the representation of the client or who are subject to the lawyer's supervision.

When transmitting a communication that includes information relating to the representation of a client, the lawyer must take reasonable precautions to prevent the

information from coming into the hands of unintended recipients. This duty, however, does not require that the lawyer use special security measures if the method of communication affords a reasonable expectation of privacy. Special circumstances, however, may warrant special precautions. Factors to be considered in determining the reasonableness of the lawyer's expectation of confidentiality include the sensitivity of the information and the extent to which the privacy of the communication is protected by law or by a confidentiality agreement. **A client may require the lawyer to implement special security measures not required by this Rule or may give informed consent to the use of a means of communication that would otherwise be prohibited by this Rule.**

We restrict access to personal information about you to 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 legal standards to guard your personal information.

We will use our best efforts to ensure that no unauthorized parties have access to any of your information. We will use our best efforts to train and oversee our employees and agents to ensure that your information will be handled responsibly and in accordance with this Privacy Policy.