### **PRIVACY POLICY**

Effective Date: 11/17/2022

Thomas Story and Son LLC ("Company," "we," "us," or "our") is committed to our client confidential information and privacy. We do not share or disclose any non-public Personal Information about our clients or former clients to nonaffiliated third parties, except as permitted by law, as further described below. The Gramm Leach Bliley Act ("GLBA") and the adoption of Regulation S-P by the Securities and Exchange Commission ("SEC") require that an investment adviser registered with the SEC establish policies and procedures to ensure proper management of customer information in a private and secure manner.

This Privacy Policy ("Policy") provides notice to you about our privacy policies and practices. This Policy also applies to information we collect on from you through various methods, including information collected from your use of our website storyandson.com (our "Site"). If you require a version of this Policy in an alternative accessible format, please contact us at the contact information at the end of our Policy. The Company shall maintain the privacy of its clients and their Personal Information (defined below) in the manner disclosed in this Policy.

#### **I. Privacy Notice**

#### A. Privacy Statement

The following statement explains how the Company handles the Personal Information that we receive about our current and former clients. The Company is committed to protecting the privacy and confidentiality of clients' and former clients' non-public Personal Information. For the purpose of this Policy, Personal Information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

#### **B.** Information Collection

The Company may collect Personal Information through the client, or the client's authorized representative, completing forms and through applications relating to the client's account or our services. Additionally, the Company may collect Personal Information from the client's, or the client's authorized representative's that is provided in order to further interactions and communications with the Company (including in-person, phone, and electronic) relating to the client's account or our services. The Personal Information we collect may include, but is not limited to, the client's name, e-mail and postal address, phone number, government identifiers, assets, income, financial needs and goals, account balances and transactions (including those with unaffiliated third parties), profile information, background information, family information (including information regarding dependents and beneficiaries, and client objective information).

## C. Information Disclosed and Categories of Affiliates and Non-Affiliated Third Parties to who the Company may Disclose

It is the Company's policy not to disclose non-public Personal Information about our client(s) to any other parties except where required by law or authorized by the client, or authorized client's representative, or according to this Policy. From time to time, the Company may disclose Personal Information collected from clients to third-party service providers that facilitate the operation of some areas of our investment advisory business and help

administer our accounts, and the Company may also use such Personal Information in the account intake process, including conducting anti-money laundering screening. We require any third-party service providers to protect the confidentiality of your Personal Information and to use it only for the purposes for which we disclose the information to them.

#### D. Safeguards

The Company uses the following security measures to protect the privacy of clients. All non-public Personal Information in our systems is guarded by technical and organizational controls designed to mitigate security risks and ensure the security, integrity and availability of our systems and data. In instances where non-public Personal Information is exchanged via the internet, electronic and procedural methods to safeguard this exchange are used. It is the policy of the Company to ensure non-public Personal Information about a client is protected, stored, maintained and disposed of in ways designed to ensure such information is safeguarded from unauthorized uses or disclosures. However, while the Company uses reasonable information security practices, cybercriminals are increasingly persistent and sophisticated, and no information security program can guarantee perfect security.

#### E. Service Providers

The Company shares information with non-affiliated third party service providers in order for the third party to carry out its services for us, including service providers that help support our marketing, outreach, security and IT functions, investment services, reporting and service providers that acts as our auditors and advisors.

#### F. Processing and Servicing Transactions

The Company may share information when it is necessary to effect, administer, or enforce a transaction for our clients or if a client initiates a request for us to share Personal Information with an outside party. All requests by clients must be received in writing from the client.

#### G. Sharing as Permitted or Required by Law

The Company may disclose Personal Information to non-affiliated third parties as permitted by law. For example, this may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit or examination, the sale of an account to another financial institution or a merger, acquisition or other corporate reorganization.

#### H. Privacy Notice Delivery

All new clients shall receive an separate privacy notice prior to entering into an investment management agreement, as well as an annual privacy notice.

#### **II. Personal Information Collection and Use**

# A. Personal Information We Collect and Have Collected in the Past 12 Months – Sources and Categories

In the 12 months preceding the date of this Policy, we may have collected your Personal Information when you visited our Site, requested information about our products or services, provided us with your information at a

conference or other event, interact with our Site, or when you voluntarily provided information to us through our Site or to us through other means, or email or phone call. We will continue to collect Personal Information from the same sources.

The categories of Personal Information we may have collected from these sources during the 12 months preceding the date of this Policy, and will continue to collect, include the following:

- **Personal identifiers:** Name, address, email address, telephone numbers, IP address or other unique identifier, account name and password, and other similar information.
- **Financial and insurance information:** Bank account information, financial information, source of income, investments, assets information, insurance and other similar information.
- Protected class information: [Age
- Internet or other electronic activity information: Device and browser type, your browsing and search history on our Site, and information regarding your interaction with our Site.
- Inferences drawn from any of the Personal Information identified above.

#### B. Purposes for Collection of Personal Information

We use your Personal Information to provide you with information and services you request from us, to contact you from time to time, to provide you with news and other information about the Company, to facilitate your participation in virtual or in-person meetings or conferences, our internal business and marketing purposes. We may use Personal Information of applicants and employees to evaluate you or otherwise process your data for employment purposes.

Additionally, we use Personal Information, including about your use of our Site, to monitor or improve our Site; for internal business analysis; to prevent fraud, activities that violate our Terms of Service or that are illegal; and to protect our rights and the rights and safety of our users or others.

#### C. Additional Information About How We May Share Personal Information

We may also share your Personal Information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also share your Personal Information with third parties to help detect and protect against fraud or data security vulnerabilities. And we may transfer your Personal Information to a third party in the event of a sale, merger, reorganization of our entity or other restructuring. Additionally, we may share your information with our affiliates.

#### D. Online Data Collection

We may have certain cookies on our Site, detailed below, that automatically collect some information about your use of our Site.

Cookies are small, sometimes encrypted text files that are stored on computer hard drives by websites that you visit. They are used to help users navigate websites efficiently as well as to provide information to the owner of the websites. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org.

When you visit our Site, we may place a "cookie" or other online tracking devices (e.g. web beacons) that recognizes you. The cookies and other tracking technologies may also collect information about your IP address or actions taken in connection with the Site. We may use cookies or similar tracking technologies to capture information about the use of our Site, including to improve your user experience. Accordingly, we may store and retrieve information on your device through the use of cookies and similar technologies.

#### III. California Shine the Light

California Civil Code Section 1798.83, also known as the "Shine the Light" law, permits California residents to annually request, free of charge, information about certain categories of Personal Information a business has disclosed to third parties for direct marketing purposes in the preceding calendar year. For information, please contact us as indicated in below "contact us" section.

#### **IV. Personal Information of Minors**

Our products and services are not directed to minors under the age of 13. We do not knowingly collect the Personal Information of minors under the age of 13. If you are a parent or guardian and believe we may have collected information about your child, please contact us immediately as described in the "Contact Us" section below.

#### V. Third Party Websites

Our Site may contain links to other third-party websites, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these websites. Accordingly, we recommend that you review the privacy policies posted on any website that you may access through our Site.

#### VI. Do Not Track

Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. At this time, our Site do not respond to browsers' do not track signals.

#### **VII. Contact Us**

630-878-0747 <u>tstory@storyandson.com</u> Thomas Story and Son LLC P.O. Box 71 Culver, IN 46511