

Lucien, Stirling & Gray Advisory Group, Inc.
Privacy Information for Our Clients

Revised March 23, 2018

A key component of the Gramm-Leach-Bailey (GLB) Act of 1999 requires that all financial institutions establish and communicate by July 1, 2001 written policies for the protection of customer information.

Lucien, Stirling & Gray Advisory Group, Inc., a Registered Investment Advisor, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest of confidence. These records include all personal information that we collect from you, which is held by us or held by vendors we use for information storage and retrieval and/or back-up, in connection with any of the services provided by us. **We have never disclosed information to nonaffiliated third parties, except as required by law, or as directed by you, and do not anticipate doing so in the future.** If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first.

For purposes of complying with SEC Rule 17a-3(a)(17), the Money Laundering Abatement Act, and the USA PATRIOT Act, Lucien, Stirling & Gray Advisory Group, Inc. maintains a database containing the information required under these rules/laws. Information contained in this database is subject to scrutiny by governmental and regulatory agencies as permitted or required under regulation or law. The database is not used for commercial purposes.

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account. Such information will include the name, address, tax status and other information that will allow appropriate identification to be made. We will also ask to see driver's license, or other government issued ID with a photo, as part of the verification process.

As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- **We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.**
- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as required by law or regulation, or as directed by you. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We strive to maintain a secure office and computer environment so that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend on the scope of the client engagement and will include information about your personal finances, information about your health to the extent that it is needed for the planning process or to apply for insurance, and information about transactions between you and third parties.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be archived or destroyed.

If you have any questions about this Privacy Policy, please contact your representative.