

Our Promise to You

As a client of SMG Financial Advisors, LLC (SMG), you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number;
- Information regarding securities transactions effected by us; and
- Client financial information such as net worth, assets, income, bank account information and account balances.

How We Manage and Protect Your Personal Information

SMG collects nonpublic information about clients and consumers. We will not share nonpublic personal information about clients or consumers with third parties not affiliated with SMG, except as noted below.

Specifically, SMG may share personal information as necessary:

- To complete transactions or account changes as directed by the client;
- To maintain or service a client's account;
- If requested to do so by a client;
- With contracted service providers providing administrative functions for SMG; or
- If SMG is required or permitted by law or regulatory authorities with jurisdiction over the firm to do so.

SMG will maintain administrative, technical and physical safeguards reasonably designed to ensure the security and confidentiality of client records and information. To protect this information, we:

- Require new employees to review and acknowledge the firm's compliance policy manual, which includes this privacy policy, and all employees to review and acknowledge the compliance policy manual annually.
- Prohibit an employee from providing client information over the telephone or in response to an e-mail message unless the employee has identified the other person as the client, a fiduciary representative of the client, an authorized agent of the client or a party that needs the information to complete a transaction for the client (such as broker-dealers, custodians or administrative service providers).
- Limit access to confidential information about clients to those employees who need to know such information.
- Maintain appropriate security measures for our computer and information systems, including the use of passwords and firewalls.

- Use a shredding machine, locks and other appropriate physical security measures to safeguard client information stored in paper format. For example, employees are expected to secure client information within locked cabinets when the office is closed.
- Engage a third party service provider only after we have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential personal information except as necessary to carry out its assigned responsibilities and only for that purpose.

When Must We Give You Our Privacy Policy

The following notice requirements apply to SMG's clients.

Initial Privacy Notices

We will deliver an initial privacy notice to a client before the client relationship is established – that is, before we begin to manage a client's account.

Annual or Revised Privacy Notices

We will deliver our privacy notice to clients on an annual basis, defined as every 12 months or upon making any changes to it. We are not required to deliver annual privacy notices to former clients.

Definitions

For purposes of this policy, the terms "Consumer", "Client" and "Confidential Information" have the following definitions:

- A. "Consumer" is not necessarily a client but may be anyone who obtains financial products or services from SMG used primarily for personal, family or household purposes. Examples of consumer relationships include: (1) a prospect with whom SMG is actively pursuing an investment relationship; or (2) a prospect who provides SMG with nonpublic information (such as net worth information or potential portfolio size) after attending a seminar or community event or listening to a radio talk show at which an employee of SMG is a featured speaker.
- B. "Client" means (1) an individual with a specific and continuous relationship with SMG who obtains or has obtained a financial product or service from SMG used primarily for personal, family or household purposes; or (2) that individual's designated representative.
- C. "Confidential Information" is personally identifiable private information (information not available from public sources such as the phone book or a website) about the client or consumer, including information regarding name and address, age, social security number, assets, income, net-worth, account balance, account number, bank account information, beneficiary information and investment activity (such as purchase and redemption history).

Please do not hesitate to contact us with questions about this notice.