BARNETT & COMPANY Investment Counsel

Privacy Notice

In establishing an advisory account with Barnett & Company, it is necessary that you provide Barnett & Company with certain personal financial information necessary to ensure that your account is managed in a manner consistent with your investment objectives and personal financial goals. This information will generally be derived from the following sources:

- Information we receive from you on account application forms and other forms, and
- Information about your securities transactions with Barnett & Company or other advisers and broker/dealers which may be providing financial services to you.

It is the policy of Barnett & Company that we do not disclose any non-public personal information about you to anyone, except as permitted by law.

If you decide to close your account(s) with Barnett & Company or become an inactive customer, Barnett & Company will adhere to the privacy policies and practices as described in this notice.

Barnett & Company restricts access to your personal and account information to those employees who need to know that information to provide products or services to you. Barnett & Company maintains physical, electronic, and procedural safeguards to guard your non-public personal information.