

Privacy Policy



SMEDLEY FINANCIAL SERVICES, INC.®

Registered investment advisory firm since 1982.

CLIENT PRIVACY NOTICE

This privacy notice is from Smedley Financial Services, Inc.®, (“SFS”) a registered investment advisory firm. We are in the business of providing investment advisory services to clients.

Smedley Financial Services, Inc.® is committed to safeguarding the confidential information of our clients. We hold all personal information provided to our firm in the strictest confidence. Our investment advisor representatives may also be registered representatives of Securities America, Inc., (“SAI”) a registered broker-dealer that is not affiliated with our firm. We may also have relationships with other nonaffiliated firms, including, but not limited to, investment advisor firms, such as Securities America Advisors, Inc. (“SAA”) an affiliate of SAI, insurance companies, trust companies, custodians, other financial institution entities, and unaffiliated service providers, such as independent contractors, and internet web providers. Except as required or permitted by you or by law, we do not share confidential information about you with nonaffiliated third parties. In the unlikely event there were to be a change in this fundamental policy that would permit additional disclosures of your confidential information, we will provide written notice to you, and you will be given an opportunity to direct us as to whether such disclosure is permissible.

SMEDLEY FINANCIAL SERVICES, INC.®

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**AN IMPORTANT NOTICE CONCERNING OUR
CLIENTS' PRIVACY.**

CLIENT INFORMATION WE COLLECT. We collect and develop personal information about you, and some of that information is nonpublic personal information ("Client Information"). The essential purpose for collecting Client Information is to provide and service the financial products and services you obtain from our firm. The categories of Client Information collected by us depend upon the scope of the engagement with us and are generally described below. As an investment adviser, we collect and develop Client Information about you in order to provide investment advisory services. Client Information we collect includes:

- Information we receive from you on financial inventories through consultation with our representatives. This Client Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about your financial products and services transactions with us.

DATA SECURITY. We restrict access to Client Information to those representatives and employees who need the information to perform their job responsibilities within our firm. We maintain agreements, as well as physical, electronic and procedural securities measures that comply with federal regulations to safeguard Client Information about you.

USE AND DISCLOSURE OF CLIENT INFORMATION TO PROVIDE CLIENT SERVICE FOR YOUR ACCOUNTS.

To administer, manage and service customer accounts, process transactions and provide related services for your accounts, it is necessary for us to provide access to Customer Information within our firm and to nonaffiliated companies such as SAI, SAA, other investment advisers, other broker-dealers, trust companies, custodians and insurance companies, and unaffiliated service providers, such as independent contractors, and internet web service providers. We may also provide Client Information outside of our firm as permitted by you or by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

FORMER CLIENTS. If you close an account with our firm, we will continue to operate in accordance with the principles stated in the notice.

REQUIREMENTS OF FEDERAL LAW. In November of 1999, Congress enacted the Gramm-Leach-Bliley Act ("GLBA"). The GLBA requires certain financial institutions, including broker-dealers and investment advisers, to protect the privacy of Client Information. To the extent a financial institution discloses Client Information to nonaffiliated third parties other than as permitted by you or required by law, clients must be given the opportunity and means to opt out (or prevent) such disclosure. Please note that we do not disclose Client Information to nonaffiliated third parties except as permitted by you or required by law (e. g., disclosures to service your account or to respond to subpoenas). All Client Information obtained through SFS is kept private and confidential.

