



Privacy Policy

An important part of the relationship we have with our Clients is the information you share with us. We want you to know how we treat your private information.

We keep personal information such as your Social Security Number and account balances confidential. We take steps to safeguard this data from anyone who should not have access to it. We do not sell this information to anyone.

In your dealings with APCM, you can expect that we will take the steps outlined below to keep the information we have about our customers confidential and secure.

Our Privacy Policy

In providing financial services and products to you, we collect certain nonpublic information about you. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to you, or as permitted by law. Protecting your privacy is important to us.

Information We Collect

The nonpublic personal information we have about you includes what you give us when you open an account or communicate with us. This could include

- Your name and address
- Social Security Number
- Investment objectives and experience
- Financial circumstances
- Employment
- Account balance and account transactions.

How Information Is Used and Disclosed

We use information about you to provide our asset management services to you, such as managing your investment account. We may disclose this information to third parties as permitted by law, including the outside broker-dealers, custodians, administrators, transfer agents, accountants or attorneys that we need to use to provide our services to you. From time to time, we must give information about our business to regulatory authorities. This may include personal information about you.

We do not sell personal non-public information about our Clients to anyone.

How Information Is Safeguarded

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of your information. These include confidentiality agreements with companies we hire to help use provide services to you, password-protected user access to our computer files and strict confidentiality policies that apply to all APCM personnel.