

**BARRETT UPTON CAPITAL PARTNERS, LLC**  
**NOTICE OF OUR PRIVACY POLICY**

*July 2023*

The relationship we have with our clients is our most important asset, and we understand that you entrust us with your private financial and personal information. Protecting the privacy your personal information is important to us. This notice describes the practices and policies through which we maintain the confidentiality and protect the security of your non-public personal information.

**What Information We Collect**

In the course of providing services to you, we may collect the following types of “non-public personal information” about you (“Customer Information”). The purpose of collecting Customer Information is to allow us to provide advisory services to you. Such Customer Information may include the following:

- Information we receive from you on applications or other forms which may include personal and household information such as income, spending habits, investment objectives, financial accounts, statements of accounts and other records concerning the types and amounts of investments and bank account information. Additional information we gather includes information concerning employee benefits and retirement plan interests, wills, trusts, mortgages, and tax returns.
- Identifying information such as you name, age, social security number, etc. Information about your transactions with us and others (e.g. broker/dealers or other chosen investment sponsors), as well as other account data.

**What Information We Disclose**

In the normal course of serving clients, your Customer Information may be shared with third party service providers when it is essential for the servicing of your account. This can include investment managers, custodians, broker-dealers, and tax preparers. These companies will use this information only as necessary to provide services to you and as allowed by applicable law.

We do not disclose the Customer Information we collect about you to anyone except: (i) in furtherance of our business relationship with certain service providers, and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, third-party service providers, insurance companies, tax preparers, etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, regulators, etc.); (iii) companies that provide services to us such as our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. We do only share information as necessary to conduct businesses and we have confidentiality

agreements in place with them. We do not disclose Customer Information about you or any of our former clients to anyone, except as permitted by law.

### **Confidentiality and Security Procedures**

To protect your personal information, we restrict access to your Customer Information to only those authorized employees who need to know that information to service your account. Your information is protected in various manners. We maintain physical, electronic and procedural safeguards to protect the confidentiality, integrity and security of your non-public personal information. This includes seeking confidentiality agreements with service providers. Further, all employees are subject to a policy regarding confidentiality. Employees who violate our privacy policy are subject to disciplinary process. We strive to maintain the confidentiality of your account and any other personal information.

We will continue to adhere to the privacy policies and practices in this notice even after your account is closed or becomes inactive.

In accordance with federal law, in no case will we disclose your tax return information to any location outside the United States, to another tax return preparer outside of our firm for the purposes of second opinions, or to any other third party for any purpose other than to prepare your return without first receiving your consent.

Certain communications involving tax advice are privileged and not subject to disclosure to the IRS. By disclosing contents of those communications to anyone, or by turning over information about those communications to the government, you may be waiving that privilege. To protect this right to privileged communication, please consult with us or your attorney prior to disclosing any information about our tax advice. ,

For questions about our policy, or for additional copies of this notice, please contact Elizabeth Watkins, Chief Compliance Officer, at Barrett Upton Capital Partners, LLC.

### **Changes to Our Privacy Policy**

Except as required or permitted by law, as described above, we do not share Customer Information about you with non-affiliated third parties. In the unlikely event, there were to be a change in this fundamental policy that would permit or require 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 acceptable.