

# **QCI ASSET MANAGEMENT**

## ***CLIENT PRIVACY STATEMENT***

### **GUIDING PRINCIPLES**

The relationship between QCI Asset Management, Inc. and our clients is the most important asset of our firm. We strive to maintain your trust and confidence; an essential aspect of which is our commitment to protect your personal information to the best of our ability. We believe that all of our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services. We have not and will not sell your personal information to anyone.

### **THE PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN AND COMMUNICATE**

QCI Asset Management, Inc. collects and maintains your personal information so we can provide investment management services to you. The types and categories of information we collect and maintain about you include:

- Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, and financial information);
- Information that we generate to service your account (such as trade tickets and account statements);
- Information that we may receive from third parties with respect to your account (such as trade confirmations from brokerage firms).

In order for us to provide investment management services to you, we do disclose your personal information in very limited instances, which include:

- Disclosures to companies – subject to strict confidentiality agreements – that perform services on our behalf (such as our technology consultants who assist us in maintaining our computer systems); and
- Disclosures to companies as permitted by law, including those necessary to service your account (such as providing account information to brokers and custodians).

### **HOW WE PROTECT YOUR PERSONAL INFORMATION**

To fulfill our privacy commitment at QCI Asset Management, Inc., we have instituted firm-wide practices to safeguard the information that we maintain about you. These include:

- Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep your personal information safe.
- Limiting access to personal information to those employees who need it to perform their job duties.
- Requiring third parties that perform services for us to agree to keep your information strictly confidential.
- Protecting information of our former clients to the same extent as our current clients.