



EDGAR INVESTMENT
MANAGEMENT, LLC

Privacy Policy
Revised March 2022

Edgar Investment Management, LLC
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Please replace your existing privacy policy from Edgar Investment Management, LLC with this updated version released March 2022.

Schedule D – Privacy Policy

Atop the list of priorities at Edgar Investment Management, LLC (“EIM”) is protecting our clients’ privacy. At EIM we commit to our clients that no financial or nonfinancial information will be sold or given to third parties except:

- Third parties used by EIM to directly assist in the management of client assets and accounts and/or the management of firm. This would include, but is not limited to, asset custodians, consultants, lawyers, accountants, etc.;
- To government bodies where required by applicable laws or regulations; and
- Professional organizations investigating member activities. This would include organizations such as CFA Institute, American Institute of CPA’s, CFP Board, etc. These organizations are bound by strict privacy policies and only use client information in connection with investigations.

In connection with offering investment advice, EIM may gather the following information about clients:

- Client agreements and other information that clients provide EIM, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client’s name, address, phone number, email address, social security number, employment information, income, investment experience, and credit references;
- Personal tax returns provided by the client;
- Client transactions; and
- Public information needed to properly advise client.

We only disclose non-public client information to nonaffiliated third parties without prior client consent when we believe it necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;
- To perform services for the firm or on its behalf to develop or maintain proprietary trading or other software;
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of our business or an operating unit;
- To help us prevent fraud;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm; and
- To comply with federal, state or local laws, rules and other applicable legal requirements.

If it is necessary to disclose any client personal information in a way that is inconsistent with this policy, EIM will give clients advance notice of the proposed disclosure so that they will have the opportunity to opt out of such disclosure. The Firm believes that sharing client private information under the circumstances noted above is either mandated by law or necessary for the Firm to conduct its business and to best service client accounts. Clients desiring to opt out of the above disclosures should contact EIM immediately to terminate its agreement with you and arrange for account transfer.

Current and former clients are equally protected under this privacy policy

EIM takes various steps to safeguard client information. We restrict access to the personal and account information of our clients to our employees and agents for business purposes only. We maintain physical, electronic, and procedural safeguards to guard your personal information.

We have internal controls to keep client information as accurate and complete as possible. If you believe that any information about you is not accurate, please notify EIM immediately.

We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations, and they are not intended to be exclusive. If you have any questions about our Privacy Policy, please contact us at 832-680-4272.