

# BELLWETHER

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**Bellwether Investment Group, LLC**  
5502 Hixson Pike, Suite G  
Hixson, TN 37343

## **PRIVACY NOTICE**

**March 2023**

### Our Commitment to Privacy

The relationship between Bellwether Investment Group, LLC and our clients is our most important asset. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect the confidentiality, integrity, and security of your personal information. As we believe that all of our clients value their privacy, we do not disclose your non-public personal information ("information") to anyone unless it is required by law, or at your direction. We do not sell your personal information to anyone. We maintains physical, electronic, and procedural safeguards that comply with federal standards to protect our clients' nonpublic personal information. Through this policy and its underlying procedures, our Firm attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

### Personal Information That We Collect, Maintain, and Communicate

We collect personal information so we can provide financial planning and investment advice services to you. The types and categories of information we collect and maintain about you include:

- Information we receive from you to provide financial planning and investment advice services to you (such as your date of birth, social security number, address, telephone number, and financial information);
- Information about your transactions with us or others to service your account (such as investments bought or sold and account statements);
- Information that we receive from third parties with respect to your account (such as statements from insurance or brokerage firms).

In order for us to provide financial planning and investment advice services to you, we may disclose personal information that we collect and maintain in very limited instances, which includes:

- Disclosures that are authorized or requested by you (for example, to receive an insurance or annuity quote or a tax estimate);
- Disclosures that are required by law (for example, to cooperate with regulators or law enforcement/judicial authorities);
- Disclosures to companies as otherwise permitted by law, including those necessary to service your account (such as providing information to our staff).
- Disclosures to unaffiliated service providers and vendors in furtherance of establishing, maintaining, and reporting on the client's Firm relationship (i.e., broker-dealer, account custodian, record keeper, technology, performance reporting, customer relationship management software [CRM], proxy voting, insurance, independent managers, sub-advisers, etc.);

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*Registered Investment Advisor*

5502-G Hixson Pike • Hixson, TN 37343  
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## How We Protect Your Personal Information

To fulfill our privacy commitment, we have instituted practices to safeguard the information that we maintain about you. These include:

- Maintaining physical, electronic, and procedural safeguards that comply with federal and state regulations to guard your personal information;
- Limiting access to personal information to employees and third parties that are necessary or appropriate to provide services to you;
- Protecting information of our former clients to the same extent as our current clients.
- The Firm does not, and shall not, disclose or share information with any affiliated or nonaffiliated persons, entities or service providers for marketing or any other purposes or reasons not referenced above.

## Combatting Identity Theft With Proactive Measures

Among the proactive measures that we may employ to protect our clients from identity theft are some or all of the following:

- Conducting an annual meeting between the Chief Compliance Officer and personnel, which acts as a forum to discuss the threat of identity theft and our procedures to safeguard client information.
- Limiting the amount of NPPI collected from each client to an amount reasonably necessary for us to accomplish its advisory duties.
- Limiting access to records containing nonpublic personal information to those persons who are reasonably required to have access to such information during the normal course of their duties.
- Requiring employees to report any suspicious or unauthorized use of customer information.
- Limiting access to electronically stored nonpublic personal information to those persons having a unique computer system log-in ID, and requiring that such persons change their log-in passwords periodically.
- Involving our information technology department in the development of procedures to protect electronic information.
- Implementing a data encryption package in all portable computers and devices to protect personal information.
- Requiring all employees, third-party service providers, and independent contractors to enter into a confidentiality and restrictive covenant agreement.
- Alerting clients to the dangers of identity theft as well as the need for them to protect their confidential information.
- Establishing internal controls with respect to the flow of client information.
- Requiring terminated employees to return all records containing nonpublic personal information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored in laptops, files, work papers, or portable devices).

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## Protecting Client Non-Public Personal Information (NPPI)

It is our policy to undertake reasonable measures to protect the unauthorized access or use of client non-public personal information, including, but not limited to, consumer report information (collectively referred to as “client information”), in connection with its disposal. To that end, we have established the following procedures relative to the disposal of client information:

- All hard copy records containing client information shall be transferred to a format that cannot practicably be read or reconstructed (e.g., through burning, pulverizing or shredding of papers, etc.);
- All client information stored on electronic media shall be erased such that the information cannot practicably be read or reconstructed;
- All employees shall be cross-trained in our client information disposal procedures.

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