



## Client Information Privacy Notice

InvesTrust Consulting, LLC is engaged in providing advisory services to clients, and as such, collects client information regarding those clients. The company recognizes the importance of our clients' privacy expectations. We are committed to maintaining the confidentiality, integrity and security of all client information entrusted to us. This Privacy Statement describes the non-public client information we collect and the circumstances under which we may share it with others who are not affiliated with InvesTrust Consulting.

### What Information Do We Collect?

As part of providing you with our services, we obtain non-public information which may include the following:

- Client/committee contact information provided to us by the client, whether in writing, in person, by phone, electronically or by any other means
- Client financial information such as statements, balances, holdings, and transactions from custodians and third-party investment managers
- Corporate documents, Investment Policy Statements and agreements with third-party investment managers

### How Do We Use Information We Collect?

We use client information to:

- Provide advisory services, allocation services, investment policy development and third-party manager searches
- Fulfill obligations to any regulatory or government body as required by law.

### Disclosure of Client Information

As a matter of policy, InvesTrust Consulting does not disclose any non-public information about clients or former clients to non-affiliated third parties unless permitted or requested in writing by a client, for the reasons listed above. InvesTrust Consulting may share information with our affiliates for everyday business purposes and non-affiliated software providers that provide administrative services to us. However, our arrangements with these providers require them to treat your information as confidential.

### Affiliations

InvesTrust Consulting, LLC is owned by InvesTrust Wealth Management, LLC and is under common control with its affiliates: InvesTrust, a banking/thrift institution and InvesTrust Retirement Services, an independent retirement plan services provider.

*InvesTrust Consulting **does not** share client information with affiliated companies or unaffiliated third-parties for marketing purposes and will not sell client names to companies for marketing or research. We do not participate in joint marketing.*

### Security of Client Information

InvesTrust Consulting maintains office security to ensure that client information is not placed at unreasonable risk of disclosure. The Firm maintains physical, electronic, and procedural safeguards that protect our clients' non-public information. Federal and state securities regulators may review the Firm's records and clients' records as permitted by law.

Client information will be maintained for period of time as required law. After that time the information may be destroyed. The destruction of such information will be done in a manner reasonably designed to protect non-public client information.

### Client Notifications

We are required by law to annually provide a notice describing our Privacy Policy. In addition, we will inform you promptly if there are changes to our policy. Please do not hesitate to contact us with questions about this notice us at (405) 843-7046 or

[www.investrust.com/consulting](http://www.investrust.com/consulting).