

# PRIVACY NOTICE

## For Walnut Investment Services LLC Clients

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Protecting your privacy is a crucial element in the way Walnut Investment Services LLC conducts business. This Privacy Notice explains the types of information we collect from our individual clients in order to provide investment advisory and financial planning services (“Services”); how we may use or disclose that information; and the measures we take to safeguard that information.

### What Information Do We Collect?

We collect non-public personally identifiable information about you as described in this section to provide our Services. We refer to all of this information as “Client Information.”

- Client Information from you: We may collect your name, address, social security number, family and marital status, investment objectives, financial goals, risk tolerance, and information about your income, assets, investments, liabilities, expenses and personal financial transactions.
- Client Information from other sources: For investment advisory and financial planning services, we may collect trading and transaction history for your investment advisory account, and statements or records we receive from investment firms, tax preparations firms, and other professionals that you have retained and authorized to provide information directly to us.

### How Do We Use and Disclose Client Information?

We use Client Information to:

- Provide advice and information to help you meet your financial and investment objectives, including information about other products and services that may be of interest.
- Fulfill our obligations to the FINRA, New York & New Jersey investor protection bureaus and any other regulatory or government body to whom we are required to report.
- In order to provide our Services, we may disclose Client Information to non-affiliated companies that perform services for us (“service providers”), namely Fidelity Investments which we use to custody our clients’ account. We require all service providers to have written contracts with us that specify appropriate uses of Client Information.

We may also disclose Client Information to non-affiliated third parties for purposes which may be required by law or regulation. Such necessary disclosures may include:

- To comply with a court order, legal process, or other judicial or investigative proceeding that produces a request for information from us;
- To fulfill or respond to a request from you or your authorized representative;

## **How We Protect Your Information**

All Walnut Investment Services LLC principals and employees are bound by codes of professional conduct, to protect the confidentiality of clients' information, and to prevent unauthorized use, access to, or disclosure of Client Information. The use of, and access to Client Information is restricted to those employees who need to know that information to provide Services to you. We maintain commercially reasonable physical, electronic, and procedural safeguards to protect Client Information from unauthorized access and disclosure.