

WILLOW GROVE ADVISORS CLIENT PRIVACY POLICY

Willow Grove Advisors, LLC respects your desire for privacy and is committed to maintaining the confidentiality of your personal financial information. This document outlines our privacy policy for consumers who obtain services from us.

Our Collection of Information About You. We may collect nonpublic personal information about you in order to understand your needs, administer our business, process transactions, and provide you with products and services. We obtain nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms (such as your name, address, social security number, assets and income);
- Information about your transactions with us, our affiliates, or others (such as your account balance, payment history, parties to transactions, and credit usage); and

Our Disclosure of That Information.

- *Our Service Providers* – We may disclose some of the information described above, such as your name and address, to companies that perform marketing and other services on our behalf (e.g., to companies that assist us with mailings).
- *Others* -- We may disclose information about you, your accounts and transactions: (a) where it is necessary or helpful to effect, process or confirm your transactions; (b) to verify the existence, history and condition of your account for credit reporting agencies; (c) to comply with legal process, such as subpoenas and court orders; (d) to law enforcement authorities if we believe a crime has been committed; (e) if you give us your consent; and (f) as otherwise permitted by law.

We do not disclose nonpublic personal information about our current or former customers to others, except as set forth in this policy.

State Rights. Depending on where you live, you may have additional privacy protections under some state laws. For example, certain state laws may restrict the types of information we may disclose about you, limit the parties with whom we may share such information, or require us to provide you with additional notices or opt-out rights. We will comply with applicable state laws before sharing nonpublic personal information about you. We may do this by sending a separate notice of those rights to you.

Maintaining Accurate Information. We have procedures in place that help us to maintain the accuracy of the personally identifiable information that we collect. Please write Willow Grove Advisors, LLC., Operations Dept. 1919 Addison Street, Suite 101, Berkeley, CA 94704 or call 510-705-1693 if you believe that our information about you is incomplete, out-of-date, or incorrect.

Information Security. We restrict access to nonpublic personal information about you to those employees who have a need to know such information (e.g., to process your transactions or provide services to you). We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Changes to this Policy. We may add to, delete, or change the terms of this Privacy Policy from time to time. If required by law, we will provide you with a notice of the change.

Questions. If you have any questions regarding this policy, you can write to us at Willow Grove Advisors, LLC., Operations Dept., 1919 Addison Street, Suite 101, Berkeley, CA 94704 or call us at 510-705-1693.