



YOUR PRIVACY IS IMPORTANT TO US

Tollefson & Company Investment Management LLC is committed to confidentiality and privacy of client information. We are committed and bound to do so as a matter of trust between clients and advisers and also by ethical and legal requirements, which govern our professional activities.

We are also required to protect the nonpublic, personal information of customers of financial institutions in accordance with a new federal law known as the Gramm-Leach-Bliley Act which governs businesses and professional organizations like brokerage firms and advisory firms like our own that provide financial services to clients. Investment advice primarily provided for personal, family or household uses are among those the Gramm-Leach-Bliley Act deems financial in nature.

Please be kind enough to read our privacy policy below to learn more about how we treat and safeguard the personally identifiable financial information of our clients and former clients.

PRIVACY POLICY

Definitions

When we use the words “you” and “your” in this statement, we mean current or former clients who have or have had a continuing client relationship with Tollefson & Company Investment Management LLC. “Nonpublic personal information” means information about you that we collect in connection with providing you with advisory services. Nonpublic personal information does not include information that is available from public sources such as real estate records and telephone directories.

How We Gather Information

We collect nonpublic personal information about you to enable us to provide you with advisory services. The information is collected in a variety of ways from you including in written form, by telephone, through information you provide or direct us to obtain through electronic means such as e-mail and in the course of your personal consultations, interviews and contacts with your advisors and our employees. We may also collect nonpublic personal information from other companies or professionals you may retain such as fiduciaries, accountants and firms providing custodial services to you. We collect such information so that we can effectively provide the advisory services required by you.

Restrictions on the Disclosure of Nonpublic Personal Information

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. As an example of the latter, we are permitted by law to share your information with firms that provide custodial services to you. We collect information pertinent to our investment advisory services such as income, net worth, tax information, demographic information such as social security or tax identification numbers, addresses, employment, drivers license and/or passport numbers for verification of identity and as necessary legal documents pertaining to trusts, retirement accounts or as otherwise appropriate to the management of client assets.

Our Security Practices

As a firm whose principals have extensive experience in the handling of sensitive client information, we have and will continue to take steps to safeguard your nonpublic personal information. For example, we restrict access to nonpublic personal information of clients and former clients to those principals and employees who need to know that information in the course of their responsibilities within our firm or in the case of employees, their job responsibilities within the firm. We maintain physical, electronic and procedural safeguards to guard your information.

Other Information

The examples contained within this privacy policy are illustrations; they are not intended to be exclusive. We also reserve the right to change this privacy policy, and any other policies described above, at any time. Should you have any questions, please contact or call your advisor.

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