

Privacy Policy

At Stillwater Investment Management, LLC we respect your right to privacy and are committed to protecting it. By adhering to the practices described herein, we affirm our continued commitment to protecting your privacy and maintaining the trust you have given us.

The Securities and Exchange Commission (SEC) was required by the Gramm-Leach-Bliley Act to establish standards to safeguard client information and records. As a result, the SEC adopted Regulation S-P, which, among other things, requires investment advisers registered with the SEC to adopt appropriate policies and procedures that address safeguards to protect this information and to disclose its privacy policies to clients. As part of this SEC requirement, we are required to provide this privacy policy notice to all prospective clients upon entering into a contract with us and annually thereafter.

This privacy policy applies to consumers who are current or former investment advisory clients or who provide us with information as prospective clients of Stillwater Investment Management, LLC. Throughout the policy we refer to information that personally identifies you and your account(s) as “personal information”.

- 1) We do not disclose private personal information about our current or former clients, including their names, to non-affiliated third parties except as required or permitted by law.
- 2) Our employees and affiliated persons are required to protect the confidentiality of personal information and to comply with our stated policies. They may access personal information only when there is an acceptable reason to do so, such as to service your account or provide you with investment services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us.
- 3) We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information, which comply with applicable SEC, state, and federal laws.
- 4) We do not sell your personal information to anyone.
- 5) From time to time we collect personal information about you from the following sources:
 - a) Information you provide on applications or other forms. This information may include name, address, phone number, e-mail address, social security number, account numbers and information about your investments and investment experience.
 - b) Information derived from your transactions with us. As a client of our firm, we collect and maintain personal information about your transactions, account positions and balances to enable us in the investment management function. We may include your name or other data on internal client lists and reports that we use for management of your account(s) with us.
- 6) Occasionally, we may provide personally identifiable information to outside third parties that we have contracted with to provide services that assist us in managing your account (ie., class action claims provider). In such situations, we stress the confidential nature of personal information being shared. **You have the right to say no to sharing any information with these third parties. You may Opt-Out by calling our office at 651-275-9380.** Please note we will be unable to provide these services to you as a client if you opt out of third-party sharing.
- 7) If you ask us to provide personally identifiable information to a third party which we do not have an agreement with (ie: your accountant, banker or lawyer), you must provide that request in writing.
- 8) We strive to keep our records of your information accurate, and we take immediate steps to correct errors. If there are any inaccuracies in your statements or in any other communications from us, please contact us.
- 9) If you use our website, we do not track visits.
- 10) We preserve the content of your e-mail, your e-mail address and our responses so that we can more efficiently handle any follow-up questions you may have and to meet legal and regulatory requirements. It is important to understand that regular e-mail is not secure. We strongly urge you not to send confidential information such as social security or account numbers to us via a non-secure e-mail address. Please contact us to find out the best way to send us confidential information. We would only send you confidential account information in an e-mail in a secure manner. You may also contact us by phone, fax, or U.S. mail.
- 11) Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy.

Privacy is a partnership. Because privacy matters, we pledge to work together with you to protect and control the security of your confidential financial information. If you have any questions or concerns, please contact us.

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