

Pflug Koory, LLC

Privacy Policy

As a firm, we are committed to maintaining the confidentiality, integrity, and security of all client information, including personal information. We will collect only such information as is necessary for us to properly manage client investment portfolios. Given the wide variety of clients served by the firm, the personal information we collect will vary somewhat from client to client. Generally, the personal information we collect will be:

- Information we receive from clients on or in applications or other forms, correspondence, or conversations, including, but not limited to, name, address, telephone number, social security number, assets, and date of birth.
- Information about client transactions with us, brokers, banks, and others, including, but not limited to, account number, balances, purchases and sales of securities, cost basis information, and other financial information.

We will not sell clients' personal information to anyone.

We will not disclose any personal information about our current or former clients except as permitted by law. For example, we are permitted by law to disclose all of the information we collect to brokers or transfer agents to process client transactions. Furthermore, we restrict access to client personal information to those persons who require such information to provide products or services to you.

We may disclose personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities.

We will maintain physical, electronic, and procedural safeguards to protect clients' personal information. (See below.)

Inasmuch as clients' investments are actually held in custody by other financial intermediaries, i.e. brokers, banks, trust companies, the privacy policies of those entities govern how personal information maintained by them would be shared with nonaffiliated third parties.

We will inform our clients annually of our privacy policy including any changes that may be made in the future.

Privacy Procedures

Given the private, personal nature of the client information contained in client files of Pflug Koory, LLC, all such information is to be treated as confidential. Personal client information is not to be provided to any third party in any form except to transact business for the benefit of the client, when required or permitted under law, or upon express direction from of the client, e.g. to facilitate the preparation of income tax returns, estate plans, etc.

As a general rule, client files containing personal information will remain in the office of Pflug Koory, LLC except as required for client meetings or occasional overnight work. File cabinets will remain closed during any extended absence from the office. Files should be stored in file cabinets unless required for meetings or work. When unattended, the office will remain locked.

Electronic files of Pflug Koory, LLC containing personal client information will not be accessed by third parties. As with hard copy files, electronic files will remain in the office of Pflug Koory, LLC (except for offsite back up copies). Computers and applications containing electronic files will be password protected and remain off when the office is unattended. Access to the Schwab Institutional web site requires additional password security using individually issued authentication cards. Access to the Morningstar Office data base and client files requires password security. Wireless configuration, firewalls, etc. are designed to prevent unauthorized access to company computers and data.

Physical office security is facilitated by keyed, locked interior and exterior doors. Each employee is issued a set of keys to the office. Lost or stolen keys are to be reported immediately.

Reviewed February 24, 2017