

Michael McDaniel, dba McDaniel Wealth Management
PRIVACY PROCEDURES

Investment Advisers are required to create and maintain a policy for the purpose of protecting client's personal nonpublic information. Additionally, the privacy policy must include disclosure outlining under what circumstances nonpublic personal information will be communicated to nonaffiliated third parties. Privacy Notices must be clear and conspicuous so that a client can reasonably understand the Investment Adviser's policies and procedures for handling personal nonpublic information.

Clients who have a continuing relationship with Investment Adviser will be provided with a copy of the Privacy Notice on an annual basis. Annual basis is defined as any period of 12 consecutive months.

Investment Adviser will provide each client with a copy of its Privacy Policy not later than the time when a customer relationship is established. Generally, this is at the time other required disclosures are to be given to the client, such as the Form ADV or disclosure brochure, margin disclosure, etc. An exception may be made to the initial delivery procedure if delivery would pose a significant impediment to the conduct of routine business practice or the client agrees to receive the notice later, in order to obtain products and services immediately.

Clients who no longer have a continuing relationship with Investment Adviser will only be provided with the Investment Adviser's current Privacy Notice and any other required disclosure, if nonpublic personal information is disclosed to nonaffiliated third parties.

Investment Advisers who disclose nonpublic information to nonaffiliated third parties that are not covered by one of the exceptions under the Gramm-Leach Bliley Act, must provide clients with an opt out notice prior to disclosing information.

Investment Adviser may enter into arrangements with nonaffiliated third parties for the purpose of performing services or functions on behalf of Investment Adviser. Such arrangements will be entered into under an agreement setting forth each party's responsibilities and will contain a confidentiality clause.

Definitions

Consumer An individual who obtains or has obtained a financial product or service from Investment Adviser.

Customer or Client A consumer who has a customer relationship with the Investment Adviser.

Investment Adviser Refers to *Michael McDaniel*.

Nonpublic Personal Information Personally identifiable financial information and any list, description or other grouping of consumers and publicly available information pertaining to them that is derived using any personally identifiable financial information that is not publicly available.

Record Keeping

Investment Adviser will maintain a copy of any written Privacy Notice given to clients. Additionally, evidence will be maintained of the clients who were provided with an initial written Privacy Notice and each annual notice thereafter.

In compliance with the implementation of the privacy regulations, Investment Adviser shall deliver to each existing client a copy of its Privacy Notice and maintain a distribution list.

Safeguards

Investment Adviser does not share nonpublic personal information with nonaffiliated third parties that are not covered under one of the exceptions under 248.14 and 248.15 of Regulation S-P. Nonpublic client information is maintained in client files and is not made available for public access.

Procedures

Investment Adviser will provide an initial Privacy Notice:

1. At the time a customer relationship is established. Generally, Investment Adviser will provide new clients with a copy of its Privacy Notice not later than at the time the client executes the advisory agreement.

Generally, Investment Adviser will not provide an additional Privacy Notice to an existing customer who obtains additional financial products or services, provided the Investment Adviser's Privacy Notice has not changed.

Investment Adviser will not disclose nonpublic personal information to nonaffiliated third parties.

Investment Adviser may disclose nonpublic personal information as required by law. Additionally, Investment Adviser may disclose nonpublic personal information to nonaffiliated third parties for the purpose of them providing services to clients on Investment Adviser's behalf, joint marketing arrangements, or to comply with rules and regulations to which the Investment Adviser is subject.

Annual Privacy Notices may be posted to the Investment Adviser's web. Investment Adviser will maintain documentation of any client's acknowledgement and agreement to receive Privacy Notices electronically.

An annual Privacy Notice will not be sent to clients who request no communication from Investment Adviser. However, Investment Adviser will make its Privacy Notice available to such a client promptly upon request.

INVESTMENT ADVISER'S PRIVACY NOTICE

McDaniel Wealth Management values our customers and makes it a top priority to safeguard the confidential information of our customers. We are committed to protecting your privacy and maintaining your trust and confidence.

McDaniel Wealth Management collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected may vary depending on the products and services requested and the scope of your engagement with us.

Information Collected About You

McDaniel Wealth Management collects nonpublic personal information about you from the following sources:

- ◆ Information provided on applications and related forms, such as name, address, telephone number, Social Security or Tax Identification number, birth date, net worth, annual income, information about your personal finances, financial information such as bank accounts, and medical information if insurance services are provided.
- ◆ Information about your transactions with us, such as account balances, payment history, account numbers, and account activity.
- ◆ Information from your employer, association, or benefit plan sponsor regarding any group products we may provide or assist in reviewing on your behalf.
- ◆ Information from consumer reporting agencies, such as credit bureau reports and other information relating to your creditworthiness. Additionally, information may be obtained such as demographics depending on the products and services you are requesting from us.

We do not disclose information to nonaffiliated third parties about our current or former customers, except as permitted by law. However, should for any reason our policy change, we will notify you by providing you with an amended Privacy Notice prior to making disclosure of your nonpublic information to nonaffiliated third parties that are not permitted under law.

Policies and Practices to Protect Your Personal Information

We train our staff to take caution in handling personal information. We restrict access to nonpublic information about you to staff that need to know such information, who assist in providing products and services to you, or who assist in the administration of the office, in order to maintain confidentiality of your information. Further, we limit staff access to information to only those who have a business or professional reason for knowing such information. Limited access is given to nonaffiliated third parties, as permitted by law, in order to execute securities transactions on your behalf, or in order to provide account maintenance or customer service on your accounts.

If you close your account, cease services with us, or become an inactive customer, we will continue to adhere to the privacy policy disclosed herein, unless we notify you by providing an amended Privacy Notice.

Disclosure of Personal Information

We may disclose personal information obtained from you to financial service providers that service or provide support to your accounts, as permitted under law, such as:

- ◆ Securities broker/dealers.
- ◆ Other investment advisers.
- ◆ Insurance agents and insurance companies.
- ◆ Investment companies.
- ◆ Third-party administrators and vendors hired to effect, administer or enforce transactions or services in your accounts.
- ◆ Consumer reporting agencies in connection with your application or renewal of insurance coverage.

We will not share information about you with nonaffiliated third parties, unless we have provided you with an updated Privacy Notice and provided you with an opportunity to approve or disapprove of the sharing of your information.

Additionally, we may be required by law or regulation to disclose information to third parties such as in response to a subpoena, to prevent fraud, to comply with rules and regulations to which we are subject, in response to inquiries from industry regulators, and in order to comply with our broker/dealer's policies with whom our associated persons may be registered.

We will affirm our Privacy Policy annually in writing, provided you maintain an ongoing relationship with us.