

## PRIVACY NOTICE

Spectrum Financial, Inc. honors our client's right to privacy and strives to maintain the highest standards of confidentiality. In that respect, we are providing this Privacy Notice to all of our clients in accordance with Regulation S-P as released by the SEC (Securities Exchange Commission).

**Privacy Policy:** Spectrum's policy is to protect personal client information. We do not sell or maintain lists for any outside nonaffiliated marketing firms. We are committed to maintaining physical, electronic, and procedural safeguards to protect any personal information we obtain about our clients.

**Information Collected About You.** The non-public personal information we collect about our clients comes primarily from the account applications, management agreements, and client profiles you submit to us when opening a managed account. We may also collect information about your transactions and account history for your managed accounts through various nonaffiliated companies such as mutual funds, life insurance companies, brokerage houses and trust companies.

**Use and Disclosure of Information:** Spectrum will not disclose personal client information, except as permitted by law under the following circumstances:

- Your written request to provide information to a third party.
- To establish or maintain an account with a nonaffiliated third party, such as a clearing broker, life insurance Company, trust company or mutual fund Company in which Spectrum would actively manage.
- To sub-advisers contracted by Spectrum to actively manage specific strategies.
- To render services that you have requested (as in completing a wire transfer or other withdrawal from your account) or any other services provided to you on our behalf.
- To government entities or other third parties in response to subpoenas or other legal processes as required by law.

**Security Policy:** We maintain physical, electronic, and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information. Access to confidential client information is authorized only for those Spectrum employees who require information to perform their job functions.

**Closed or Inactive Accounts:** If you decide to close your account (s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

**Changes to this Privacy Notice:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

### PROXY STATEMENT

Spectrum does not provide services for proxy voting to its clients. All proxies are sent directly to clients from the custodian. Spectrum periodically reviews client options at each custodian to ensure proper coding is maintained on all client accounts. If any client receives material contrary to Spectrum's proxy voting statement, they should contact our office immediately. Spectrum occasionally votes proxies for its principals. Questions concerning proxy voting can be directed to our Client Services Department.

### Firm Brochure ADV Part 2

Spectrum offers the Firm Brochure ADV Part 2 on the opening of each client account and material changes as they apply. To ensure all clients are offered our updated Firm Brochure ADV Part 2 you can request a copy by calling our office at 757-463-7600 or download from our disclosures on our website [www.InvestSpectrum.com](http://www.InvestSpectrum.com).

### CODE OF ETHICS OFFERING

Spectrum offers its Code of Ethics on the opening of each client account. To ensure all clients are offered our Code of Ethics, you can request a copy by calling our office at 757-463-7600 or download from our disclosures on our website [www.InvestSpectrum.com](http://www.InvestSpectrum.com).

It is important to contact Spectrum if there are any changes in your personal/financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services to you. Please also advise Spectrum if you intend for us to impose, add, or modify any restrictions to our management services for your account.