

## CAPITAL INVESTMENT COUNSEL, INC.

### PRIVACY POLICY

**At Capital Investment Counsel, our relationship with our clients is our most important asset. We understand that you have entrusted us not only with your hard-earned assets, but also with your personal and financial data. We consider our clients' data to be private and confidential, and we hold ourselves to the highest standards of trust and fiduciary duty in their safekeeping and use. The following describes our firm's privacy policy.<sup>1</sup>**

**We do not sell your personal information to anyone.**

**We collect nonpublic personal information about our clients from the following sources:**

- ❖ *Account Applications and other Forms*, which may include a client's name, address, social security number, and information about a client's investment goals and risk tolerance;
- ❖ *A Client's Professional Advisors such as attorneys and accountants*, who may provide financial, investment history and tax information about a client
- ❖ *Account History*, including information about the transactions we have ordered for you and balances in your account; and
- ❖ *Correspondence*, written or telephonic between you and us or your broker or custodian and us.

**We will not release information about you or your accounts to any third party unless one of the following conditions is met:**

- ❖ We receive your prior consent
- ❖ We believe the recipient to be you or your authorized representative, including your attorney or accountant
- ❖ The recipient is a broker, custodian or other service provider with whom we must share information in order to manage your account properly
- ❖ We are required by law to release the information to the recipient

**We will only use information about you and your accounts to:**

- ❖ Help us better serve your investment and financial needs
- ❖ Suggest services or other materials that may be of interest to you, and
- ❖ Administer our business.

We restrict access to nonpublic personal information about you, as much as possible, to those employees who need to know that information in order to provide our services to you. We also maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

**We will adhere to the policies and practices described in this notice whether you are a current or former client.**

We may revise our privacy policy in the future. If you would like a current copy of our privacy policy at any time, you may call Sharon Gaare at 303-329-9000.

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<sup>1</sup> Throughout the policy, we use "you" and "your" to include not only our existing clients, but also prospective clients. We refer to information that personally identifies you or your accounts as "personal information."