

Pine Haven Investment Counsel Privacy Policy and Procedures

Our Commitment to You: Protecting our clients' privacy is of paramount importance to Pine Haven Investment Counsel. It is our policy that no client financial information obtained by us is sold or made available to third parties except that:

- Third parties may be used by Advisor to assist in the management or maintenance of client accounts (such as a client's custodian);
- Client information may be released in accordance with applicable laws and regulations.

We will not share nonpublic personal information about our clients with nonaffiliated third parties without prior client consent, except for specific purposes described below.

How Pine Haven Gathers Information: In order to provide clients with investment management services, we may obtain information about them from the following sources:

- Client agreements and other information that clients provide to us, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client's name, address, family situation, phone number, email address, social security number, employment information, income, account numbers and investment experience
- Transactions on a client's behalf. This information may include balances, positions, investment interests and history; and
- Public sources.

Sharing Information with Nonaffiliated Third Parties: We only disclose non-public client information to nonaffiliated third parties without prior client consent when we believe it necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information (for example for your CPA to complete your taxes);
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;
- To perform services for the firm or on its behalf to develop or maintain proprietary trading or other software;
- To help us prevent fraud.

We never will disclosure client nonpublic personal information to other companies who may want to sell their products or services to you.

Opt Out Provision: If, at any time in the future, it is necessary to disclose any of client personal information in a way that is inconsistent with this policy, we will give our clients advance notice of the proposed disclosure so that they will have the opportunity to opt out of such disclosure.

Former Clients and Prospective Clients: Our Privacy Policy continues to apply to all former clients and any prospective client.

To Whom This Policy Applies: This Privacy Policy applies to individuals who have sought to obtain, or have obtained services from Pine Haven Investment Counsel.

Our Security Practices and Information Accuracy: We take steps to safeguard client information. We restrict access to the personal and account information of our clients to our employees and agents for business purposes only. We maintain physical, electronic and procedural safeguards to guard your personal information.

Additionally, we have internal controls to keep client information as accurate and complete as we can. If you believe that any information about you is not accurate, please let us know.

Other Information: We reserve the right to change this Statement of Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive.