



## **Bristlecone Advisors Privacy Policy**

March 2020

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). To affirm our commitment to the proper use of client information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our clients. Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your non-public personal information.<sup>1</sup>

### **INFORMATION WE COLLECT**

We believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for us.

Bristlecone Advisors must collect certain personally identifiable financial information about its clients to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our affiliates, or others;
3. information we receive from a consumer reporting agency.

We have established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.

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<sup>1</sup> Nonpublic personal information is defined as personally identifiable financial information, and any list, description or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available.

## **INFORMATION WE DISCLOSE**

Our firm limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients.

We want to assure all of our clients that whenever information is used, it is done with discretion. We do not disclose any non-public personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

## **CONFIDENTIALITY AND SECURITY**

The safeguarding of client information is an issue we take seriously. Employee access to personally identifiable client information is limited to those with a business reason to know that information to provide financial products or services to you. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Bristlecone employees are responsible for maintaining the confidentiality of client information, and employees who violate these Privacy Principles will be subject to disciplinary measures.

Bristlecone recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, we have established appropriate physical, electronic, and procedural safeguards that comply with federal standards to guard against any unauthorized access to client information.