

# Wallick Investments, LLC

## Client Information Privacy Principles

November 2023

Like most industries today, the financial services industry is rapidly being shaped by technology, which is changing the way we do business. To be successful in this environment, we must continue to ensure that our clients are confident that we will manage their financial affairs expertly and confidentially.

At Wallick Investments, LLC our clients have access to a broad range of investment products. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain client information.

We want to assure all of our clients that whenever information is used, it is done with discretion. The safeguarding of client information is an issue we take seriously at Wallick Investments, LLC. To affirm our continuing 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.

1. **Recognition of a Client's Expectation of Privacy:** At Wallick Investments, LLC, 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 one of our highest priorities.
2. **Use, Collection, and Retention of Client Information:** Wallick Investments, LLC 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. In accordance with regulatory requirements, information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth.
3. **Maintenance of Accurate Information:** Wallick Investments, LLC recognizes that it must maintain accurate client records. Therefore, 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.
4. **Limiting Employee Access to Information:** At Wallick Investments, LLC, employee access to personally identifiable client information is limited to those with a business reason to know such information. 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 Wallick Investments, LLC employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.
5. **Protection of Information via Established Security Procedures:** Wallick Investments, LLC 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 security standards and procedures to guard against any unauthorized access to client information. We have included a Data Security Disclosure that outlines some of the safeguards we take to ensure the security of your information.
6. **Restrictions on the Disclosure of Client Information:** Wallick Investments, LLC will only share client information with other entities when it is required to conduct routine business, or it is legally required, or with permission from the client.

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7. Maintaining Client Privacy in Business Relationships with Third Parties: We do not provide personally identifiable client information to third parties.
8. Disclosure of Privacy Principles to Clients: Wallick Investments, LLC recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should contact Daniel Wallick via email at DanWallick@Wallickinvestments.com or call him at 803-699-9400.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.

## Data Security Disclosure

In order to protect ourselves and you against data theft, Wallick Investments, LLC and our client custodians have taken the following precautions.

1. After hours and holidays, Wallick Investments' offices are locked and dead bolted. As of May 6, 2022 our offices are also protected by a Sonitrol Security System in addition to building security.
2. All Wallick Investments' client files are maintained in lockable, fireproof file cabinets. Laptop computers when stored in office overnight are also in these fire safes.
3. For digital security of the firm's devices, Wallick Investments contracts with IT professionals. In addition to "gateway" security, all WI computers that connect to the internet are equipped with personal firewalls and anti-virus, anti-spam and spyware detection software.
4. Our client-custodian interface guards against keystroke logging programs which attempt to access user name and password information.
5. Wallick Investments minimizes the use of wireless internet connections.
6. Our client custodians protect the transmission of information from our computers to theirs through Secure Socket Layer (SSL) technology encryption.
7. Our client custodians are members of the Securities Investor Protection Corporation (SIPC), a non-profit corporation that provides account protection to clients of registered broker-dealers.
8. Wallick Investments' clients also receive additional custodial account protection through underwriters at Lloyd's, London.

Although these precautions cannot guarantee us against fraudulent transactions, Wallick Investments, LLC believes it is our duty to do everything possible to protect our data. Because identity theft has become so prevalent, we encourage you to consider taking similar steps to protect yourself. **You may also want to subscribe to a continuous credit monitoring service to ensure that if your identity is ever stolen, you would be notified in a timely manner.** If you would like additional information regarding monitoring services or our policies and procedures, please contact our Compliance Officer, Daniel Wallick at 803-699-9400.