

CLIENT PRIVACY POLICY

At Goelzer Investment management, we greatly appreciate the confidence and trust you have placed in us. Nothing is more valuable to us, as investment advisors, than our relationship with you.

The confidentiality of your personal financial information is of paramount importance to us, and we will remain vigilant in protecting your privacy. We are sending you this privacy notice to help you understand how we use your private financial information and to let you know what we do to help protect your privacy.

What Information Do We Collect From You and About You?

To serve our client needs, Goelzer Investment Management collects information from you and about you. Some of this information is collected to satisfy certain legal and regulatory requirements, while other information is collected so that we can service your account effectively. Examples of the information that we collect include:

- Information from your account application and other forms, such as name, address, Social Security number, telephone number, employment information, income, net worth, investment experience, and other information to service your account effectively.
- Information about your financial transactions, including securities purchased and sold, fund transfers, account balances, and other account activities.

To Whom Do We Disclose Your Information?

Goelzer Investment Management does not sell your personal financial information to anyone.

However, we may disclose your personal information to third parties or outside companies that help us process your transactions or service your account. One such company is our clearing firm Fidelity, which processes your transactions and acts as the account custodian. Other companies to whom we may disclose your personal information include outside investment advisors or asset managers, variable annuity or insurance companies, mutual fund companies or the like. We may also provide information to outside service providers that print and mail your account statements or provide other services that help facilitate our ability to efficiently manage your account. Any outside company or third party provider must limit their use of your information to the purpose for which it was provided.

Goelzer Investment Management may also provide your personal information when permitted or required by law or regulation. Examples include providing information in response to a subpoena or court order, to cooperate with regulators, governmental authorities or law enforcement authorities, or in response to a request from a consumer reporting agency.

Outside of these circumstances, we will not provide your personal information to third parties unless you have specifically asked us to do so.

How Do We Protect Your Personal Information?

We restrict access of your personal financial information to personnel who require that information to service our relationship with you. All employees are trained regarding the policies and procedures encompassed by this privacy policy. We maintain physical, electronic and procedural safeguards to guard your personal information.

This privacy policy applies to all of our current and former clients. If in the future this privacy policy needs to change for any reason, we will provide you with written notification of the change, allowing you the opportunity to opt-out. For questions regarding Goelzer Investment Management's privacy policy, please call Jeffrey Bush directly at (317) 264-2606 or (800) 428-1618.