

Haviland & Sams, LLC

Privacy Policy

Haviland & Sams, LLC is committed to the highest professional standards of ethics and integrity. In our relationships with our clients, former clients and prospective clients, we take strict precautions to protect the confidentiality of any and all client information including, but not limited to, any communication, written, verbal or electronic, tax returns, investment statements, bank balance statements, insurance policies and estate planning documents, which clients furnish to us or which may be furnished to us in their interest by others such as attorneys, accountants and other advisors.

We maintain physical, electronic, and procedural safeguards to protect the confidentiality and security of all personal information furnished to us. The types of personal information we collect may include:

- ◆ Social Security number or taxpayer identification number
- ◆ Home address or email address
- ◆ Assets, income and financial information

In order to conduct our regular business in advising clients we may collect non-public client information such as:

- ◆ Information reported by you on applications or other forms you provide to us (for example, new account applications, information included on your tax return or on any insurance applications)
- ◆ Information about your financial transactions, including holdings, contributions and withdrawals, of your investment or retirement portfolio with investment managers

Haviland & Sams, LLC has always been and will continue to be bound by the strictest standards of confidentiality. We affirm to you that:

- ◆ We will safeguard, according to strict standards of security and confidentiality, any information you share with us. This policy applies to current and former clients.
- ◆ We will permit only authorized employees to have access to that information.
- ◆ We will not reveal your information to any external organization or individuals, affiliates or non-affiliates, in any form whatsoever unless we have been authorized to do so by you, or are required to do so by Federal or State law.

We do not share your personal information. Specifically, by way of example we do not:

- ◆ Report to credit bureaus information about your creditworthiness; or
- ◆ Share information for marketing purposes or joint marketing with other financial companies.

Our relationship with you is one of our most vital assets. We recognize that you have entrusted us with your private financial and personal information, and we will do our utmost to maintain this trust. From time to time, we may amend our Privacy Policy. You will receive appropriate notice when our Privacy Policy changes.

If you have any questions about this policy, please do not hesitate to contact Benjamin B. Sams.

Haviland & Sams, LLC
30 Stanford Drive
Farmington, CT 06032

(860) 678-1414

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