

H. S. Dreher Capital Management, LLC

POLICY ON DISCLOSURE OF NON-PUBLIC PERSONAL INFORMATION

Information we collect

In the course of serving our clients, and in talking to prospective clients, we collect and develop information that is non-public and personal. Besides the traditional name-rank-and-serial-number type of information (such as phone numbers, addresses, social security numbers and bank account numbers), we develop a financial profile that may include a summary of financial and other assets, income sources such as pensions and social security payments, spending requirements and goals and objectives for these items.

Disclosure of information to nonaffiliated third parties

We do not disclose, or retain the right to disclose, any non-public personal information about our clients, prospects or former clients to any nonaffiliated third party, **except** in the event we have prior written consent (such as a request to disclose account balances to a mortgage lending company), or as permitted by law and to entities that enable us to perform our services, such as custodians and transfer agents. Under most circumstances, such entities obtain information from you directly--our function being to facilitate the information transfer such as in the case of brokerage application and transfer forms, which require your signatures--and these entities have their own privacy policies with the obligation to communicate.

(In the case of trade-aways, however, wherein we may choose a third-party service provider, such as a brokerage firm, other than your primary provider or custodian, we are required to furnish non-public information including your social security number and account number at your primary custodian. We use a limited number of third-party service providers that at times give us execution prices lower than your primary broker and thereby save you money. We also may select such a broker to gain access to an investment offering not provided by your primary broker. These third-party providers need the information to comply with the same securities laws that govern us, and to be able to deliver the securities purchased, or receive securities sold, to and from your primary broker. All third-party providers maintain their own privacy policies.)

Disclosure of information to affiliates

H.S. Dreher Capital Management, LLC does not have any affiliates.

Safeguarding procedures

In addition to our non-disclosure policy described above, we safeguard non-public, personal information with physical and electronic precautions.

Thomas E Velevis, CFP®
Managing Principal
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