

## PRIVACY POLICY

### Confidentiality

Woodley Farra Manion Portfolio Management, Inc. and its employees strictly guard the privacy of your nonpublic information. We do not sell your information to anyone. Furthermore, Woodley Farra Manion does not give or share any of your private information unless we are directed to do so by you or it is with the brokerage firm or bank where your assets are held. Additionally, in the course of conducting securities transactions it may be necessary to provide some specific and limited information about you in order to complete the transaction. Should regulatory or legal authorities request information about you, it will only be provided if it appears appropriate and upon the presentation of the document, if applicable.

All internal documents containing nonpublic information about you are maintained electronically in a secure, password protected document management system or securely onsite in our office. All confidential documents to be disposed of are shredded. Our computer network system is accessible through personal employee credentials and are continuously monitored via threat detection software.

### Categories of Private Information

- Information we receive from you on applications or other forms, such as your name, address, phone number, Social Security number, etc.;
- Information about your assets, such as the value and make-up of your portfolio or your assets outside the account we manage for you;
- Family information, including names, ages or relationship between you and your family members, immediate or otherwise.

We value your trust and confidence. Your privacy is of the utmost importance to us. All members of the Woodley Farra Manion team understand the level of importance we place upon confidentiality and are committed to maintaining the security of your private information.