



GILMAN HILL ASSET MANAGEMENT, LLC

Privacy Policy Disclosure

The relationship between Gilman Hill Asset Management, LLC (GHAM) and each of our clients is one of the most important assets of our firm. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect the confidentiality of your personal information to the best of our ability. We believe that you value your privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services. We have not and will never market your personal information to anyone.

GHAM collects and maintains certain nonpublic personal information in order to serve your financial needs, provide customer services, offer new products or services, and fulfill legal and regulatory requirements. The types and categories of personal information that we collect and maintain about you include:

- Information that we receive from you to open an account (such as your home address, social security number, telephone number, occupation, assets, and income);
- Information about your relationship with us (such as products or services purchased, account balances and payment history); and
- Information from visitors to our website (such as that provided through online forms, site visitorship date and online information collecting devices known as “cookies”).

We may share nonpublic personal information with our affiliates (companies that are controlled or owned by us, or with which we share common ownership) for business purposes. We may also disclose some or all of such information about you in very limited instances to other businesses, including non-affiliated third parties, as allowed by law, for the purpose of:

- Performing services for us or on our behalf to develop or maintain software;
- Doing mailings on our behalf with assurances that under no circumstance will the information be used for any purpose other than that authorized by GHAM;
- Responding to a subpoena, preventing fraud or complying with an inquiry by a government agency or regulator; and
- Complying with the provisions of the USA Patriot Act in verifying the identity of clients.

To fulfill our commitment to protecting your privacy, GHAM has instituted firm practices to safeguard the nonpublic personal information that we maintain about you. These include:

- Adopting procedures that put in place physical, electronic, and other safeguards to keep your personal information safe.
- Limiting access to personal information to those employees who need it to perform their job duties.
- Requiring third parties that perform services for us to agree by contract to keep your information strictly confidential.

If you should have any questions regarding GHAM’s Privacy Policy, we encourage you to call us.