

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

The confidentiality of our client's personal financial information is of paramount importance to us, and we will remain vigilant in protecting the information entrusted to us. This privacy notice is meant to help clients understand how we use personal information and what we do to help protect that 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 provide our clients with written notification of the change, allowing each client the opportunity to opt out. For questions regarding Goelzer Investment Management's Privacy Policy, please call Brandon S. Watson at (317) 264-2606 or (800) 428-1618.

What Information Do We Collect from & about Our Clients?

To serve a client's needs, we collect information from that client and about that client. Some of this information is collected to satisfy certain legal and regulatory requirements, while other information is collected so that we can service accounts effectively. Examples of the information that we collect include:

- Information from account applications and other forms, such as names, addresses, Social Security numbers, telephone numbers, employment information, income, net worth, investment experience, and other information to service accounts effectively.
- Information about financial transactions, including securities purchased and sold, fund transfers, account balances, and other account activities.

To Whom Do We Disclose Personal Information?

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

However, we may disclose personal information to third parties or outside companies that help us process transactions or service accounts. One such company is our primary clearing firm Fidelity, which processes transactions and acts as an account custodian. Other companies to which we may disclose 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 account statements or provide other services that help facilitate our ability to efficiently manage accounts. Any outside company or third-party provider must limit their use of information to the purpose for which it was provided.

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

Outside of these circumstances, we will not provide a client's personal information to third parties unless that client has specifically asked us to do so.

How Do We Protect Personal Information?

We restrict access to personal financial information to personnel who require that information to service our relationship with you. We maintain physical, electronic, and procedural safeguards to guard personal information. All employees receive IT security training and training on the importance of protecting private information.