

# **Bauer Heitzmann - Privacy Policy Notice**

## **Bauer Heitzmann Commitment to Privacy**

Please note that certain details of this policy may depend on whether you deal with us through an investment professional, directly as an individual investor, or whether Bauer Heitzmann provides services to your employer or plan sponsor.

The privacy policies of Bauer Heitzmann are reviewed annually. Our printed and online notices are then updated to reflect any changes. For material changes to this statement, Bauer Heitzmann will notify our users by placing prominent notices on the site.

## **Client's Expectation of Privacy**

Bauer Heitzmann considers the protection of personal information to be a foundation of customer trust and a sound business practice. We employ physical, electronic and procedural controls and we regularly adapt these controls to respond to changing requirements and advances in technology.

At Bauer Heitzmann, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you.

As a matter of policy, Bauer Heitzmann does not disclose any non-public personal information provided by shareholders or gathered by Bauer Heitzmann to non-affiliated third parties, except as required or permitted by law or as necessary for such third parties to perform their agreements with respect to Bauer Heitzmann. As is common in the industry, non-affiliated companies may from time to time be used to provide certain services, such as preparing and mailing prospectuses, reports, account statements and other information, conducting research on shareholder satisfaction and gathering shareholder proxies. Bauer Heitzmann or their affiliates may also retain non-affiliated companies to market Bauer Heitzmann shares or products which use Bauer Heitzmann shares and enter into joint marketing arrangements with them and other companies. These companies may have access to a shareholder's personal and account information, but are permitted to use this information solely to provide the specific service or as otherwise permitted by law. In most cases, the shareholders will be clients of a third party, but Bauer Heitzmann may also provide a shareholder's personal and account information to the shareholder's respective brokerage or financial advisory firm and/or financial advisor or consultant.

## **Use, Collection, and Retention of Client Information**

Bauer Heitzmann takes great care to protect personal information about you and when we use it, we do so with respect for your privacy. Bauer Heitzmann and Bauer Heitzmann service providers may use personal information about you to service, maintain, and protect your account; process transactions in your account; respond to inquiries from you or your representative; develop, offer, and deliver products and services; or to fulfill legal and regulatory requirements.

The public and non-public personal information may be any of the following and come from any of the following sources:

- You or your representative on applications or forms (for example, name, address, Social Security number, birth date, assets and income).

- You or your employer or plan sponsor if Bauer Heitzmann provides them with record-keeping services (for example, payroll, human resources, or benefits information).
- Transactional activity in your account (for example, trading history and balances).
- Other interactions with Bauer Heitzmann (for example, discussions with our customer service staff or information you enter into our websites).
- Information from consumer reporting agencies (for example, to assess your creditworthiness for margin products).
- Information from other third-party data services (for example, to verify your identity and to better understand your product and service needs).
- You or your representative regarding your preferences (for example, your choice of electronic statement delivery, or the screen layout you specify if you use our Internet sites).
- If you purchase Bauer Heitzmann products and services, we collect billing and credit card information. This information is used to complete the purchase transaction.
- Bauer Heitzmann may also collect anonymous demographic information, which is not unique to you, such as your age, gender, household income, political affiliation, race and religion. We may gather additional personal or non-personal information in the future.
- Information about your computer hardware and software may be automatically collected by Bauer Heitzmann. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Bauer Heitzmann website.
- Other sources with your consent or with the consent of your representative (for example, from other institutions if you transfer positions into Bauer Heitzmann).

In the course of providing shareholders with products and services, Bauer Heitzmann and certain service providers to Bauer Heitzmann, such as the Bauer Heitzmann investment advisers, may obtain non-public personal information about shareholders, which may come from sources such as account applications and other forms, from other written, electronic or verbal correspondence, from shareholder transactions, from a shareholder's brokerage or financial advisory firm, financial advisor or consultant, and/or from information captured on applicable websites.

Bauer Heitzmann encourages you to review the privacy statements of websites you choose to link to from Bauer Heitzmann so that you can understand how those websites collect, use and share your information. Bauer Heitzmann is not responsible for the privacy statements or other content on websites outside of the Bauer Heitzmann website.

### **Sharing Information with Third Parties**

Bauer Heitzmann does not share personal information about our customers with unaffiliated third parties for use in marketing their products and services. We do not allow for the buying, selling, or sharing of client data gathered for text messaging. However, we may share personal information with the following entities:

- Unaffiliated service providers (for example, printing and mailing companies, securities clearinghouses, marketing service providers, and other entities who may provide services at Bauer Heitzmann direction)
- Government agencies, other regulatory bodies and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions)
- Other organizations, with your consent or as directed by your representative (for example, if you use Bauer Heitzmann as a financial reference in applying for credit with

another institution), or as permitted or required by law (for example, for fraud prevention)

Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Bauer Heitzmann. Based on the nature of your relationship with Bauer Heitzmann, we may exchange information with other third parties as described below:

- If Bauer Heitzmann provides workplace services to your employer or plan sponsor, such as payroll, human resources or benefits recordkeeping services, Bauer Heitzmann may exchange any information received in connection with such services with your employer or plan sponsor or others they may authorize.
- If you conduct business with Bauer Heitzmann through your investment professional, we may exchange information we collect with your investment professional or with others they may authorize.
- If you transact business through Bauer Heitzmann life insurance companies, we may validate and obtain information about you from an insurance support organization. The insurance support organization may further share your information with other insurers, as permitted by law. We may also share medical information about you to learn if you qualify for coverage, to process claims, to prevent fraud, or otherwise at your direction, as permitted by law.

Bauer Heitzmann reserves the right to disclose or report personal or account information to non-affiliated third parties in limited circumstances where Bauer Heitzmann believes in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities, to protect their rights or property, or upon reasonable request by any Fund in which a shareholder has invested. In addition, Bauer Heitzmann may disclose information about a shareholder or a shareholder's accounts to a non-affiliated third party at the shareholder's request or with the consent of the shareholder.

Bauer Heitzmann may share shareholder information with its affiliates in connection with servicing shareholders' accounts, and subject to applicable law may provide shareholders with information about products and services that Bauer Heitzmann or its advisers, distributors or their affiliates believe may be of interest to such shareholders. The information that Bauer Heitzmann may share may include, for example, a shareholder's participation in Bauer Heitzmann or in other investment programs sponsored by an adviser, distributor, their affiliates, a shareholder's ownership of certain types of accounts (such as IRAs), information about Bauer Heitzmann experiences or transactions with a shareholder, information captured on applicable websites, or other data about a shareholder's accounts, subject to applicable law. Bauer Heitzmann advisers, distributors, and affiliates, in turn, are not permitted to share shareholder information with non-affiliated entities, except as required or permitted by law.

### **Limiting Employee Access to Information**

We may share personal information about you with various Bauer Heitzmann corporate affiliates including internal service providers which perform, for example, printing, mailing, and data processing services.

Additionally, if you interact with Bauer Heitzmann directly as an individual investor (including joint account holders) or if Bauer Heitzmann provides services to your employer or plan sponsor, we may exchange certain information about you with Bauer Heitzmann financial services affiliates, such as our brokerage and insurance companies, for their use in marketing products and services as allowed by law.

Information collected from investment professionals' customers is not shared with Bauer Heitzmann affiliates for marketing purposes, except with your consent and as allowed by law.

## **Online Privacy**

Privacy, security, and service in Bauer Heitzmann online operations are just as critical as in the rest of our business. We use firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect Bauer Heitzmann accounts and systems from unauthorized access.

When you interact with us through online channels (for example, websites and mobile applications) owned and controlled by Bauer Heitzmann ("Bauer Heitzmann websites"), Bauer Heitzmann manages personal information in accordance with all of the practices and safeguards described previously.

When you visit Bauer Heitzmann websites, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on Bauer Heitzmann websites. We use this information for a variety of purposes, such as maintaining the security of your online session, facilitating site navigation, improving Bauer Heitzmann website design and functionality, and personalizing your experience on Bauer Wealth websites. Additionally, the following policies and practices apply when you are online.

This online privacy policy applies only to information collected through our website and not to information collected offline.

## **Cookies and Similar Technologies**

Bauer Heitzmann and our third-party service providers may use cookies and similar technologies to support the operation of Bauer Heitzmann websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor's computer or mobile device. Cookies help us to collect information about visitors to Bauer Heitzmann websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. Bauer Heitzmann cookies are also used for security purposes and to personalize your experience, such as customizing your screen layout.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when on a Bauer Heitzmann website, or if you delete cookies, you may experience some inconvenience in your use of Bauer Heitzmann websites. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences.

Both Bauer Heitzmann and third-party service providers we hire may use cookies and other technologies, such as web beacons or pixel tags, in online advertising as described below

## **Advertising on Bauer Heitzmann Websites**

Bauer Heitzmann may advertise on its own websites (including our mobile applications), and if we do, we may use information about your relationship with us, such as the types of accounts you have, to tailor advertisements about Bauer Heitzmann and third-party products and services that may be of interest to you.

We may also use third-party service providers to help us determine which Bauer Heitzmann products and services may be of interest to you. These service providers may collect information about your activity on Bauer Heitzmann websites using cookies and other technologies to analyze, for example, pages visited, search engine referrals, browsing

patterns, and responses to advertisements and promotions.

## **Online Privacy**

### **A. Connecting with Bauer Heitzmann on Social Media Sites**

Bauer Heitzmann provides experiences on social media platforms that enable online sharing and collaboration among users who have registered to use them. We may collect information you provide by interacting with us via social media, such as photographs, opinions, or Twitter handle. Any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the terms of use and privacy policies of those platforms. Please refer to them to better understand your rights and obligations with regard to such content.

### **B. Protecting Children's Privacy Online**

Bauer Heitzmann websites are not directed to individuals under the age of thirteen (13). Bauer Wealth does not intentionally collect information on Bauer Heitzmann websites from those we actually know are under 13, and we request that these individuals do not provide personal information through the sites.

## **Former Bauer Heitzmann Clients**

If you are a former customer, these policies also apply to you; we treat your information with the same care as we do information about current customers.

Fidelity offers several options for accessing and, if necessary, correcting your account information. You can review your information using your statements, or through our automated telephone or Internet services. You may also write or call us with your request for information. If you transact business through Fidelity's life insurance companies, you are entitled to receive, upon written request, a record of any disclosures of your medical record information. If we serve you through an investment professional, please contact them directly.

Specific Internet addresses, mailing addresses and telephone numbers are listed on your statements and other correspondence.

## **Unsubscribe**

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from Bauer Heitzmann by contacting us here:

- Web page: [www.bauerheitzmann.com](http://www.bauerheitzmann.com)
- Email: [info@bauerheitzmann.com](mailto:info@bauerheitzmann.com)
- Phone: (719) 575-9000

## **Opt-Out**

We do not sell your personal information to anyone. The law allows you to "opt out" of only certain kinds of information sharing with third parties. The firm does not share personal information about you with any third parties that triggers this opt-out right. This means YOU ARE ALREADY OPTED OUT.

## **Contact Information**

Bauer Heitzmann welcomes your questions or comments regarding this Statement of Privacy. If you believe that Bauer Heitzmann has not adhered to this Statement, please contact Bauer Heitzmann at:

- Address: 5755 Mark Dabling Blvd, Suite 245. Colorado Springs, CO. 80919
- Email Address: [info@bauerheitzmann.com](mailto:info@bauerheitzmann.com)
- Telephone number: (719) 575-9000
- Effective as of August 7, 2017 ("2017")