



Independent Investment Advisors, Inc.

## Customer Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our current and former customers are confident that we will manage their financial affairs expertly and confidentially.

We want to assure all of our current and former customers that whenever information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Independent Investment Advisors, Inc. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our customers.

- 1. Recognition of a Customer's Expectation of Privacy:** At Independent Investment Advisors, Inc, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Independent Investment Advisors, Inc.
- 2. Use, Collection, and Retention of Customer Information:** Independent Investment Advisors, Inc. limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, driver's license number, date of birth, employment status, annual income, and net worth.
- 3. Maintenance of Accurate Information:** Independent Investment Advisors, Inc. recognizes that it must maintain accurate customer records. Therefore, Independent Investment Advisors, Inc. has established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Independent Investment Advisors, Inc. , employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy



Principles. Because of the importance of these issues, all Independent Investment Advisors, Inc. employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

5. **Protection of Information via Established Security Procedures:** Independent Investment Advisors, Inc. recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Independent Investment Advisors, Inc. has established appropriate security standards and procedures to guard against any unauthorized access to customer information.
6. **Maintaining Customer Privacy in Business Relationships with Custodian:** If we provide personally identifiable customer information to a custodian with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
7. **Disclosure of Privacy Principles to Customers:** Independent Investment Advisors, Inc. recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Ryan Donelson at (512) 481-2575 or e-mail him/her at [ryan@iiainvest.com](mailto:ryan@iiainvest.com).
8. **Disclosure of Information to Nonaffiliated Third Parties – “Do Not Share” Policy:**  
The Company has a "do not share" policy. We do not disclose nonpublic personal information to nonaffiliated third parties, except under one of the GLBA privacy exceptions, as described below. Since the Company currently operates under a "do not share" policy, it does not need to provide the right for its clients to opt out of sharing with nonaffiliated third parties, as long as such entities are exempted as described below. If our information sharing practices change in the future, we will implement opt out policies and procedures, and we will make appropriate disclosures to our clients.
9. **Types of Permitted Disclosures – The Exceptions:** In certain circumstances, Regulation S-P permits the Company to share nonpublic personal information about its clients with nonaffiliated third parties without providing an opportunity for those individuals to opt out. These circumstances include sharing information with a nonaffiliate (1) as necessary to effect, administer, or enforce a transaction that a client requests or authorizes; (2) in connection with processing or servicing a financial product or a service a client authorizes; and (3) in connection with maintaining or servicing a client account with the Company.
  1. **Service Providers.** From time to time, the Company may have relationships with nonaffiliated third parties (such as attorneys, auditors,



accountants, brokers, custodians, and other consultants), who, in the ordinary course of providing their services to us, may require access to information containing nonpublic information. These third-party service providers are necessary for us to provide our investment advisory services. When we are not comfortable that service providers (e.g., attorneys, auditors, and other financial institutions) are already bound by duties of confidentiality, we require assurances from those service providers that they will maintain the confidentiality of nonpublic information they obtain from or through us. In addition, we select and retain service providers that we believe are capable of maintaining appropriate safeguards for nonpublic information, and we will require contractual agreements from our service providers that they will implement and maintain such safeguards.

2. **Processing and Servicing Transactions.** The Company may also share information when it is necessary to effect, administer, or enforce a transaction requested or authorized by clients. In this context, “necessary to effect, administer, or enforce a transaction”: includes what is required or is a usual, appropriate, or acceptable method:
  - a. To carry out the transaction or the product or service business of which the transaction is a part, and record, service, or maintain the clients account in the ordinary course of providing the financial service or financial product;
  - b. To administer or service benefits or claims relating to the transaction or the product or service of which it is a part;
  - c. To provide a confirmation, statement, or other record of the transaction, or information on the status or value of the financial service or financial product to the client or the client’s agent or broker.
3. **Sharing as Permitted or Required by Law.** The Company may disclose information to nonaffiliated third parties as required or allowed by law. For example, this may include disclosures in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit, or examination, or the sale of an account to another financial institution.

By understanding how the Company shares data with its clients, their agents, service providers, parties related to transactions in the ordinary course of business, or joint marketers, the Company endeavors to ensure that client data is shared only within the exceptions noted above.

**10. Treatment of Former Client Nonpublic Personal Information:** At Independent Investment Advisors, Inc, former clients receive the same treatment as do current when it comes to treatment of non public personal information.



These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers. By law we are required to provide this privacy policy on an annual basis. If we update the policy you will also be provided an update. The Privacy Policy can always be found in its latest updated version at [www.independentinvestmentadvisors.com](http://www.independentinvestmentadvisors.com).

I understand and agree to the terms of the Privacy Principles as listed above and give my permission to Independent Investment Advisors, Inc. to disclose personal financial information to the affiliated Custodian of my assets.

\_\_\_\_\_  
Client Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name