

All McKinley Carter affiliated subsidiaries/divisions, including, but not limited to McKinley Carter Wealth Services, Inc. (McKinley Carter Investment Management (DBA), McKinley Carter Trust Company (DBA)), McKinley Carter Mortgage, LLC, and McKinley Carter Insurance, LLC (collectively “McKinley Carter”) will follow the provisions of this privacy policy. McKinley Carter understands and recognizes that protecting the privacy and security of our customers is an important responsibility. That’s why we at McKinley Carter want you to understand how we protect your privacy when we collect and use information about you and the steps that we take to safeguard that information.

The Privacy Policy of

MCKINLEY | CARTER

McKinley Carter has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about you (our customers and clients) is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms, as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts, other investment accounts, transactions (such as purchases, sales, account balances, inquiries, etc.) and insurance policies (such as life, disability, etc.). We may also need to collect information related to your employment, credit history, and income.

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, trust companies, banking institutions, etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, compliance consultants, etc.); (iii) our attorneys, accountants, and auditors; (iv) our owned affiliated third party organizations; (v) consumer reporting agencies or (vi) as otherwise provided by law.

We are also permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative, technological or marketing support/services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose.

At any time during our service relationship, you may submit a written request notifying us that you do not want your nonpublic information sent to any non affiliated third party that performs any type of marketing services. You may send this written request by mail to our McKinley Carter corporate office at 2100 Market Street, Wheeling, WV 26003. If you decide at some point to either terminate any McKinley Carter services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Your Information

We restrict access to your nonpublic personal information to those employees who need to know that information to service your accounts, requests, and/or needs. We maintain physical, electronic and procedural safeguards that comply with applicable federal and/or state standards to protect your nonpublic personal information.

Changes to our Privacy Policy or Relationship with You

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change(s) to this policy before we implement the change.