



## Privacy Policy

Date Created: 2/26/2013  
Date Last Revised: 02/15/2022



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## PURPOSE

As a client of Selective, you share both public and private information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information. We respect the privacy of our client relationships and we are committed to maintaining the highest level of confidentiality. In that regard, we have developed this privacy policy.

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## INFORMATION COLLECTION

Selective collects personal information from the following sources:

- Investment advisory agreements, account applications, and other documents in connection with the maintenance of financial accounts.
  - Information provided through oral and electronic communications.
  - Information received from third parties, such as brokerage firms, about transactions and accounts.
  - Non-public information that is collected such as social security numbers, income, account balances, securities and personal holdings, driver's license numbers, passport numbers, etc.
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## CUSTOMER INFORMATION ACCESS

Selective is committed to safeguarding the confidential information of clients - we hold all personal information provided in the strictest confidence. These records include all personal information that is collected from clients in connection with any of the services provided by Selective. Selective will never disclose information to nonaffiliated third parties, except when necessary by law, or for what is required to perform outlined services. If Selective were to anticipate such a change in firm policy, Selective would be prohibited from doing so under law without advising you first. Selective uses information provided by clients to help them meet their personal financial goals while guarding against any real or perceived infringements of their rights of privacy.

Selective has contractual agreements with multiple services providers who have access to sensitive client information. We have stringent confidentiality agreements with these providers and expect them to keep information private and protected through their respective company safeguards.

Selective has a web domain ([www.selectivewm.com](http://www.selectivewm.com)) which current and prospective clients can access. Clients can develop online usernames which allow them to view their account balances and holdings, amongst other things. This domain is protected with industry standard security through a secure server and SSL (Secured Socket Layer). This provides protection to client information from hackers and others who might want to steal sensitive data.



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## SAFEGUARDS

Selective has established its Chief Compliance Officer (CCO) as coordinator of established safeguards. The CCO will be responsible for ensuring that employees have been educated on company policy and adhere to established guidelines.

The CCO will be responsible for monitoring the effectiveness of the established safeguards. At least annually the CCO will be required to investigate the usefulness of Selective's privacy policies and procedures.

Selective has established multiple avenues of protection to provide the best safeguards possible given the environment. Employees are only given access to files they need, limiting the amount of client information that is exposed. Computers are secured with passwords and antivirus to protect from cyber-attacks, and any physical files are stored within offices behind lock and key. The Selective offices are secured with dead-bolt locks and additional locking points throughout the building, including a security guard and cameras.

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## COMPROMISED SECURITY

In the event that client information is compromised Selective has outlined steps to isolate and address the issue. Below are the series of steps that will be taken if a situation ever arises:

- Monitor, limit, or temporarily suspend activity in the account until situation is resolved.
- Alert the CCO and others in the firm to see if anyone else is reporting an issue.
- Identify, if possible, the root of intrusion.
- Contact SEC and respective FINRA Coordinator.
  - <http://www.sec.gov/contact/addresses.htm>
  - <http://www.finra.org/Industry/Contacts/P016038>
- If appropriate, Selective will contact law enforcement agencies.
- Contact relevant state authorities.
- Contact the compromised client.
- Determine whether a Suspicious Activity Report (SAR) is required to be filed.

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## FORMER CLIENTS

If you are no longer a client of Selective, we continue to use, disclose, and safeguard client information as described above.

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## MODIFICATIONS TO POLICY

If necessary, the CCO will make modifications to this policy and ensure that employees are updated accordingly.