

# THIS NOTICE IS FOR YOUR INFORMATION. NO RESPONSE IS REQUIRED.

## EFS Investment Advisors LLC

### Privacy Notice

EFS Investment Advisors LLC (EFSIA) a registered investment advisor strongly believes in protecting the confidentiality and security of information we collect about you. This notice refers to EFSIA by using the terms “us”, “we” or “our”. This notice describes our privacy policy and describes how we treat the information we receive (“Information”) about you.

**What type of nonpublic personal information do we collect:** Information provided by you on applications or other forms such as your name, address Social Security number, date of birth, employment information, investment experience, and risk tolerance. Information about your transactions with us, such as your account balance, trading activity, parties to a transaction and credit/debit card usage.

**Why We Collect and How We Use Information:** We collect and use Information for business purposes with respect to our business relationships involving you. These business purposes include evaluating a request for products or services, administering our products or services and processing transactions requested by you. We may also use Information to offer you other products or services we provide.

**How We Collect Information:** We get most Information directly from you. The Information you provide us when applying for our products or services generally provides the Information we need. If we need to verify Information or need additional Information, we would consult with you as the client first, then try to obtain Information from third parties. Information collected may relate to your finances, employment, avocations or other personal characteristics as well as transactions with us or with others.

**How We Protect Information:** We treat Information in a confidential manner. Our employees, registered representatives and investment advisor representatives acting on our behalf are required to protect the confidentiality of Information. These employees and representatives may access Information only when there is an appropriate reason to do so, such as to administer or offer our products or services. We also maintain physical, electronic and procedural safeguards to protect Information; these safeguards comply with all applicable laws. Employees, registered representatives and investment advisor representatives are required to comply with our established policies.

**Information Disclosure:** We may disclose any Information when we believe it necessary for the conduct of our business or where law requires disclosure. For example, Information may be disclosed to others to enable them to provide business services for us such as, performing general administrative activities and assisting us in processing a transaction requested by you. Information may also be disclosed for audit or research purposes; or to law enforcement and regulatory services, for example, to help us prevent fraud. Information may be disclosed to others that are outside EFSIA, such as companies that process data for us or companies that provide general administrative services for us. We may make other disclosures of Information as permitted by law.

Information may also be shared with our affiliates so that they may offer you their products or services and to nonaffiliated financial services companies with which we have a joint marketing agreement, for example, an agreement with another broker-dealer to enable us to offer you certain of its products or services. We do not make any other disclosures of information to other companies who may want to sell their services to you. For example, we will not sell your name to a catalogue company. We may disclose any information, other than consumer report or health information, for the purposes described in this paragraph.

**Access to and Correction of Information:** Generally, upon your written request, we will make available Information for your review. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If you notify us that the Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in any future disclosure of Information.

**Disclosure of information about former customers:** If an individual decides to close an account or otherwise becomes an inactive customer, we will continue to follow privacy practices described in this notice with respect to such individual.

**Further Information:** In addition to any other privacy notice we may provide, a recently enacted federal law established new privacy standards and requires us to provide this summary of our privacy policy. You may have additional rights under other applicable laws. For additional information regarding our privacy policy, please write to us at 6923 Lowmiller Road, Minerva, OH 44657.