

# Blue Elm Advisors, LLC

## Privacy Policy

Blue Elm Advisors, LLC (“BEA”) recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. BEA will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information.

We want clients to understand what information we collect, how we use it, and how we protect your personal information:

Why We Collect Your Information We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

What Information We Disclose We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. BEA may disclose client's information: (1) to individuals and/or entities not affiliated with BEA, including, but not limited to certain service providers (i.e., broker-dealer, sub-advisers, account custodian, record keeper, etc.) in furtherance of the client's engagement with BEA to service your account; (2) to your authorized representative or power of attorney; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. In the event that BEA has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, BEA will allow its clients the opportunity to opt-out of such disclosure.

How We Protect Your Personal Information Privacy has always been important to BEA. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with BEA will be subject to confidentiality agreements.

Former Clients Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

Contact Us Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Eric McKean, Chief Compliance Officer of BEA. Please contact Eric at (203) 733-8292.