



INVESTMENT MANAGEMENT, LLC

### Privacy Policy Statement

#### FACTS

#### WHAT DOES BURL INVESTMENT MANAGEMENT, LLC DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers (our clients and prospective clients) the right to limit some but not all sharing. Federal law requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### What?

The firm collects personal information about consumers from the following sources:

- ✓ information provided to us to design your investment portfolio
- ✓ information provided through engagement agreements and other documents completed in connection with the opening and maintenance of an investment account
- ✓ information provided verbally, and
- ✓ information received from service providers, such as custodians, about investment account transactions.

#### How?

Financial companies often need to share consumers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their consumers’ personal information, the reasons Burl Investment Management, LLC chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Burl Investment Management, LLC share?	Can you limit this sharing?
<b>For our everyday business purposes</b> -- such as to process your transactions, maintain your account(s), respond to court orders or legal investigation	Yes	No
<b>For our internal marketing purposes</b> -- to offer our services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	Yes
<b>For our affiliates everyday business purposes</b> -- information about your transactions and experiences	No – We do not have affiliates	Yes
<b>For our affiliates to market to you</b>	No – We do not have affiliates	Yes
<b>For non-affiliates to market to you</b>	No	We don’t share

## What we do

### How does Burl Investment Management, LLC protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with state or federal law, as appropriate. These measures include computer safeguards and secured files and buildings. We also maintain procedural safeguards to protect your personal information.

### How does Burl Investment Management, LLC collect my personal information?

✓ We collect your personal information when you engage our advisory firm.  
✓ When you open, make a deposit or withdrawal from your investment account managed by our firm.  
We do not collect your personal information from others such as credit bureaus, affiliates, or other companies

### Why can't I limit all sharing?

Federal law gives you the right to limit only

- ✓ sharing for affiliates' everyday business purposes
- ✓ affiliates from using your information to market to you, and
- ✓ sharing for non-affiliates to market to you.

State laws and individual companies (i.e., your insurance company, etc.) may give you additional rights to limit sharing.

## Definitions

### Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies.

✓ *Burl Investment Management, LLC does not have an affiliate*

### Non-Affiliates

Companies not related by common ownership or control. They can be financial and non-financial companies.

✓ *Burl Investment Management, LLC does not share with non-affiliates so that they can market to you.*

### Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

✓ *We do not engage in joint marketing arrangements*

We will provide you with our privacy policy on an annual basis and at any time, in advance if our firm privacy policies are expected to change.

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