

## PRIVACY POLICY

John E. Sestina and Company considers client privacy to be a fundamental aspect of our client relationships. We are committed to maintaining the confidentiality, integrity and security of our clients, prospective clients and former clients' personal information.

Our relationship with you is our most important asset and we understand that you have entrusted us with your private information. During the course of providing you with advisory services, we may collect, retain, and use client information for the purpose of administering our operations, providing client service, processing your transactions and complying with legal and regulatory requirements. The information we collect is either provided to us by you or obtained by us with your authorization. We also require third parties that assist in providing our services to you to protect the personal information they receive from us. Third parties are non-affiliated or companies not related to us by common ownership or control.

We do not sell, exchange or disclose client non-public information with outside organizations except for discrete and reasonable business purposes in connection with the servicing of our relationship with you. The non-public information we collect may include social security numbers, dates of birth, banking information, account numbers, sources of income, credit card information and others. We reserve the right to disclose or report personal information where we believe in good faith that disclosure is required by law or to cooperate with regulators and law enforcement authorities.

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic measures. These include such safeguards as secure passwords, two step authentication, up to date anti-virus and anti-spyware software, encrypted file storage (or hardware) and control of program access.

Periodically we may revise this Policy and will provide our clients with the updated version should there be material changes. For questions regarding this policy, please call our office at 614-326-3077.