

## STEEL TOWER INVESTMENTS

# CUSTOMER INFORMATION PRIVACY POLICY

UP Strategic Wealth Investment Advisors, LLC, doing business as Steel Tower Investments (STI) views protecting private information regarding its clients and potential clients as a top priority. STI has instituted the following policies and procedures in an effort to ensure that such nonpublic private information is kept private and secure.

To provide you with the best financial and planning services, STI needs to know personal and confidential information about you and your finances. This confidential information will help us evaluate your financial situation and develop an asset management plan, and may also be used to obtain various other tax and financial planning services and products at your request. The following summarizes the privacy policy of STI as to the collection, use, retention, and security of your nonpublic personal information. The information we collect may include:

- Name, address, social security number, account numbers and date of birth;
- Asset, liability, income, business and tax information;
- Investment history, including your transactions with us and our affiliated companies; and
- Other Information you have authorized us to obtain, including but not limited to, brokerage, insurance or other financial information.

We will collect such information either directly from you, or from third parties with your authorization, through interviews, phone calls, letters, and e-mails. We will also review documents such as tax returns, financial statements, legal documents, and account statements.

Our policy is to restrict access to your personal and confidential information to employees of our firm and, in limited situations, to third party service providers such as those who hold custody of your assets, service your accounts, and process your transactions. We may share personal information about you with third party individuals or entities such as other advisors, attorneys, accountants, and insurance agents when you authorize.

You can be assured that STI is committed to maintaining the confidentiality, integrity, and security of personal and confidential information you entrust to us. We maintain physical, technological, and procedural safeguards in compliance with applicable law and regulations to guard your nonpublic personal information against unauthorized access. We do not disclose your personal information to non-affiliated third parties except: as permitted by our agreement with you; as required by law (e.g., to respond to subpoenas or government inquiries); as necessary to effect, administer, or enforce a transaction that you request or authorize; in connection with processing or servicing a financial product or a service you authorize; and in connection with maintaining or servicing your assets. The ability of third parties to further disclose and use the information is limited by the policies of our firm, applicable law, our Code of Ethics, and nondisclosure agreements where appropriate.

We may also share your personal information with STI affiliates which have been retained in connection with providing you services, or to offer you or provide you with further products and services. STI has currently retained an affiliated registered investment advisor, HBKS® Wealth Advisors, to provide a wide variety of sub-advisory, operations and compliance related services in connection with client accounts. As such, HBKS® Wealth Advisors will have access to client information when providing such services.

We reserve the right to amend our policies at any time and will notify you should any material changes occur.

Thank you for allowing us to serve you. We value your business and are committed to protecting your privacy. We hope you view our firm as your most trusted adviser and we will work to maintain your trust and respect. Please call us if you have any question or if we can be of further service.