



PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Heritage Financial Counselors, LLC ("Heritage").

Information We Collect: In connection with providing financial planning and consultation services, investment management, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others;
- Information about your visit to our website and store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the information electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user's experience.
- Information you choose to provide to us through anonymous surveys conducted through 3rd party service providers. We use this information for market research and to better understand the needs and goals of our clients or prospective clients.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. Heritage does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Heritage, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a custodian (TD Ameritrade), investment management company (Loring Ward), financial planning software service provider (eMoney), or client relationship management technology vendor (Redtail);
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Heritage;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the

marketing solicitations; and (3) the consumer has not opted out. Heritage does not receive information regarding marketing eligibility from affiliates to make solicitations.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Succession Planning: In the event that the owner(s) of Heritage retire, become incapacitated or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of Heritage would require your consent, as dictated by your signed agreement with Heritage, in order to continue providing services to you.

Your Right to Opt Out: Federal privacy laws give you the right to restrict some sharing of your personal financial information. These laws balance your right to privacy with Heritage's need to provide information for normal business purposes. However, it is Heritage's explicit policy to never share personal financial information to any party not listed above in "Categories of Parties to Whom We Disclose".

Note: Choosing to restrict the sharing of your personal financial information will not apply to information about you in response to a court order.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Charles P. Weidman, CFP®, Managing Partner at Heritage Financial Counselors, LLC, 442 Main Street (Route 202), Bedminster, NJ 07921; 862-579-2899.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Heritage Financial Counselors, LLC, 442 Main Street (Route 202), Bedminster, NJ 07921; 862-579-2899.