

## **The Appleton Group, LLC Privacy Promise**

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**Appleton Group, LLC takes your privacy very seriously. We have a commitment to protect your privacy and the confidentiality of your personal and financial information.**

At Appleton Group, our most important asset is our relationship with you. We are honored that you have entrusted us with your financial affairs, and we are committed to safeguarding the privacy of the information we maintain about you. Establishing and adhering to an effective privacy policy is an important part of that dedication.

As providers of products and services that involve compiling personal and sometimes, sensitive information, protecting the confidentiality of that information has been, and will continue to be, a top priority throughout Appleton Group and its affiliated custodians. Whether you are a current client, former client, or a potential client, we believe that you should know about the information we collect, the measures we take to safeguard it, and the situations in which we might share information with select business partners. This notice explains how Appleton Group handles and protects the personal information we collect. Our privacy promise derives from basic principles of trust, ethics, and integrity:

**1. We collect only the client information necessary to consistently deliver responsive products and services.**

Appleton Group collects information that helps serve your financial needs; provide high standards of customer service; develop and offer new products or services for our customers and potential clients; and fulfill legal and regulatory requirements. The information collected generally varies depending on the products or services you request and may include:

- Information provided in personal interviews or on applications and related forms, for example, name, address, Social Security number and annual income.
- Responses from your employer or benefit plan sponsor regarding any investment products we may provide, for example, name, age, address and Social Security number.
- Information about your relationships with us, such as products or services purchased, and account balances (if applicable), which we may obtain in writing, during telephone or Internet transactions.

### **2. We maintain safeguards to ensure information security.**

We have implemented security standards and processes including physical, electronic and procedural safeguards to ensure that access to client information is limited to select employees who may need it to do their jobs. They are required to respect the confidentiality of all client information. The images on our backup tapes are encrypted and password protected. We have adopted a Cybersecurity Policy Plan. The objective of the plan is to:

1. Ensure the security and confidentiality of client information;
  2. Protect against any anticipated threats or hazards to the security or integrity of such information;
  3. Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any client.
- The Plan shall provide standards and procedures for the protection of client privacy and security of our internal computer systems. Each employee will be required to review this plan and attend training to understand their responsibility. The standards and procedures

will incorporate our current computer inventory and configurations, client data sources and service provider information as supporting documentation for this plan.

The Plan will incorporate the following items:

**Identify** – this section provides our understanding of what the cybersecurity risks are to our systems, assets, data and capabilities.

**Protect**- this area details the appropriate safeguards to ensure delivery of critical infrastructure services.

**Detect** – develop and implement the appropriate activities to identify the occurrence of a cybersecurity event.

**Respond** – take action regarding a detected cybersecurity event.

**Recover** – develop and implement the appropriate activities to maintain plans to recover and restore any services that were impaired due to a cybersecurity event.

Within each of the above items there are categories and subcategories of activities that need to be completed to insure that an adequate amount of protection and security is provided.

### **3. We limit how, and with whom, we share client information.**

First and foremost, we do not sell lists of our clients, nor do we disclose client information to marketing companies with the exception of companies we may hire to provide specific services for us, as described below. We will share client information only for the following reasons: When it is necessary to disclose information to third parties to effect, administer, or enforce a transaction that you request or authorize — for example, when we provide information we collect to a custodian company

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from which you wish to purchase shares. When you have requested an insurance product, the insurance company may use a common application; in this way, the information you provide and authorize us to obtain may subsequently be used by one or all of these companies as necessary to determine and offer to you the product most appropriate for your needs. We may be required by law or regulation to disclose information to third parties for example, in response to a subpoena; to prevent fraud; and to comply with rules of, or inquiries from, industry regulators. In some cases, we may share information we collect for example, name, address, age and Social Security number, with other businesses such as our securities broker-dealers/custodians or insurance companies and agencies to process or service a transaction you have requested, to facilitate enhanced client services.

Appleton Group will not share information about you with another company unless you so

direct us, or unless we ask you beforehand and give you a chance to say no.

Furthermore, as permitted by federal and state laws, we may share or exchange information with companies engaged to work with us, such as: Third-party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain software; or to perform marketing research. • Financial services entities, insurance companies, or securities broker-dealers/custodians, with which we have joint marketing agreements. The information we may share is described in Section 1. We won't share information about you with third parties to market products to you. We uphold these privacy principles throughout Appleton Group and with our business partners. Companies with which we share client information are required to maintain the confidentiality of that information. In those states where privacy or consumer information laws are more restrictive than our privacy

policy, we will restrict our sharing of your information to comply with state law. We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with Appleton Group. This policy may change from time to time. We will notify you in writing when a change occurs. In this notice of our privacy promise, the words "you" and "client" are used to mean any individual who obtains or has obtained a financial product or service from Appleton Group that is to be used primarily for personal, family or household purposes.

### **4. Greater Accuracy Means Better Protection.**

We are committed to keeping accurate, up-to-date records to help ensure the integrity of the information we maintain about you. If you identify an inaccuracy in this information, or if you need to make a change to it, please contact us promptly by calling Appleton Group at 920-993-7727 or 1-866-993-7727.