

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our customers are confident that we will manage their financial affairs expertly and confidentially.

At Apriem Advisors ("Apriem"), our customers have access to a broad range of products and services from financial planning to investments and insurance. To deliver these products and services as effectively and conveniently as

possible, it is essential that we use technology to manage and maintain certain customer information.

We want to assure all of our customers that whenever information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Apriem. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our customers.

**Recognition of a Customer's Expectation of Privacy:** We believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Apriem Advisors.

**Use, Collection, and Retention of Customer Information:** We may collect the following kinds of confidential personal information about you: information we receive from you on applications or other forms, such as your name, address, phone number, social security number, occupation, assets, income and other financial and family information; and information about your transactions with us or with brokerages, banks and custodians with whom you hold investment or cash accounts. This information includes account numbers, holdings, balances, transaction history and other financial and investment activities.

We limit the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers.

**Maintenance of Information:** We have established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.

**Limiting Employee Access to**

**Information:** Employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

**Security Procedures:** We recognize that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to customer information.

**Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, we place strict limits on who receives specific information about customer accounts and other personally identifiable data. We do not share customer information with any non-affiliated third party except: when necessary to complete a transaction in the account, such as with the clearing firm or account custodians; when required to maintain or service the account; to resolve customer disputes; when requested by a fiduciary or beneficiary on the account; to our attorneys, accountants or compliance advisors; when required by a regulatory agency, or for other reasons required or permitted by law; in connection with a sale or merger of our business; or in any

circumstance that has your instruction or consent. We share the minimum amount of information necessary for that company to provide its product or service.

When you are no longer a customer, we continue to share your information as described in this notice.

**Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

**Disclosure of Privacy Principles to Customers:** We recognize and respect the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Harmon Kong or Mark Iwamoto at (888)253-0288 or e-mail [harmon@apriem.com](mailto:harmon@apriem.com).

**These Privacy Principles apply to individuals,** and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.