



# CARLSON

CAPITAL MANAGEMENT

## **CARLSON CAPITAL MANAGEMENT, LLC. PRIVACY POLICY**

### **PURPOSE**

The following information is provided, as required by Regulation S-P adopted by the U.S. Securities and Exchange Commission, to help you understand our privacy policy and how we handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. "Personal information" refers to nonpublic financial information that identifies you or your accounts. This policy applies to those who are prospective, current or former clients of Carlson Capital Management, LLC. and its affiliates, including, but not limited to CCM Tax & Trust Administration, Carlson Trust and CCM Institutional Client Services.

### **INFORMATION ABOUT YOU THAT WE COLLECT**

We collect non-public personal information about you from the following sources: information we receive from you in preparing financial plans; in completing custodial account applications; other forms; and information about your financial transactions with us, our affiliates or others.

### **OUR USE OF INFORMATION ABOUT YOU**

As permitted by law, we may disclose some or all of the information we collect to independent parties that service your account in order to provide services that you request. Service providers may include but not be limited to the affiliates listed above, our insurance services affiliate, ViaForte, custodians, or other broker-dealers and banks and others who provide services to us, such as parties who provide technical support for our systems, and our legal and accounting professionals, as well as government agencies and other parties as permitted by law.

### **WE RESPECT YOUR PRIVACY**

It is our policy to treat client information in a secure and confidential manner. We do not sell client information. We do not provide client information for marketing purposes to any outside parties. We may, at times, be required to disclose client financial information to unaffiliated service providers in compliance with applicable laws. Even if you decide to close your account(s) or become an inactive client, we will adhere to the privacy policy described above.

### **HOW WE PROTECT YOUR CONFIDENTIAL INFORMATION**

We restrict access to non-public personal information about you to employees who need that information to provide integrated wealth management services to you. These individuals respect the confidentiality of your personal information and understand their duty to safeguard it. We maintain physical, electronic and procedural safeguards to protect your non-public personal information. We ensure that the privacy of your non-public personal information is maintained at all times, including while transferring data electronically and during the disposal of information that we are no longer required to maintain.

If you have any questions, please contact Justin Stets, Chief Compliance Officer, at 507.645.8887.