

# ACIMA Private Wealth LLC

## Privacy Policy & Notice

### December, 2015

#### GUIDING PRINCIPLES

ACIMA Private Wealth (“ACIMA”) places a high value on the relationships we have with our clients and prospective clients. We have adopted policies and procedures to protect the non-public personal information which we have access to. We strive to maintain our clients’ trust and confidence in our company, an essential aspect of which is our commitment to protecting their personal information to the best of our ability. We believe that our clients and prospective clients value their privacy, so we have established this Privacy Policy and Notice to help us ensure that information about our clients and prospective clients will be handled in an appropriate manner. As a general rule, we will not disclose your personal information to anyone outside of ACIMA unless it is a fully vetted third-party service provider who assists us in providing services to you or it is otherwise permitted by law.

#### WHY YOU HAVE RECEIVED THIS NOTICE

The reason you have received this notice is that you are either a current ACIMA client, or you have contacted ACIMA about the services that we provide. This notice describes our practices and policies concerning how we handle information about you.

#### THE PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN, AND DISCLOSE

ACIMA collects and maintains your personal information so we can provide investment advisory, financial planning and family wealth services to you. The types and categories of information we collect and maintain include personally identifiable financial information about you that we obtain in connection with providing financial services to you, including:

- Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, and financial information);
- Information that we generate to service your account (such as trade tickets and account statements);
- Information about your transactions with us; and
- Information that we may receive from third parties with respect to you or your account (such as trade confirmations from brokerage firms or information from consumer reporting agencies).

#### CATEGORIES OF NON-PUBLIC PERSONAL INFORMATION DISCLOSED

ACIMA regards non-public personal information to be data such as your name, address, telephone/fax numbers, e-mail addresses, Social Security number, assets, income, investment objectives, risk tolerance, account numbers, account balances, transaction history, beneficiary information, bank account information, credit card information as well as any health and medical information.

#### UNAFFILIATED THIRD PARTIES TO WHOM NON-PUBLIC PERSONAL INFORMATION IS DISCLOSED

In order to assist us in servicing your account, there are non-affiliated third-party providers with whom we share your non-public personal information. These parties may include financial service providers (such as companies that perform services on our behalf, including securities brokers-dealers), non-financial companies (such as our technology consultants who assist us in maintaining our computer systems or entities that assist us in mailing your account materials to you), and other non-affiliated third parties to whom disclosure of non-public personal information is permitted by law (such as the Internal Revenue Service for tax purposes).

As ACIMA only shares your non-public personal information as permitted by current federal and/or state statutes and law and as we will not share your non-public personal information with non-affiliates, we have not provided an Opt-Out form.

#### CATEGORIES OF INFORMATION ABOUT FORMER CLIENTS THAT ARE DISCLOSED TO NON-AFFILIATES

If you choose to close your account(s) or become an inactive client, we will adhere to this Privacy Policy with respect to your non-public personal information. Non-public personal information about former ACIMA clients will not be treated any differently than information about our current clients.

#### HOW WE PROTECT OUR CLIENTS’ PERSONAL INFORMATION

ACIMA will make every effort to ensure that client and company-related information remains confidential. Staff is expected to refrain from discussing client relationships outside of the office. Physical client files will be kept in an organized and secure fashion. Employees are expected to make every effort to keep client specific information out of plain sight of office visitors. Except where required by law or whenever deemed necessary to transact business on behalf of the client, ACIMA and its employees are not to disclose any detailed “personally identifiable” information to any individual, group or reporting agency without the consent of the client. ACIMA operates a cloud-based work environment

If you have any questions regarding our privacy policy, please do not hesitate to call and the Firm’s Chief Compliance Officer via email at [info@acimapw.com](mailto:info@acimapw.com) or via telephone at (804) 422-8450. We thank you for your continued patronage.