

## **Clearview Wealth Management Privacy Policy Notice**

Clearview Wealth Management is required by law under the privacy provisions of the Gramm-Leach-Bliley Act to protect your privacy. This notice is to inform you of our privacy policy, particularly with respect to the nonpublic personal information we collect about you, and how we use it.

### **What information we collect:**

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications and other account forms such as your name, address, social security number and tax ID number, account number, assets.
- Information about your transactions with us and with service providers, such as your account balance, investments, transaction history, and income earned on investments.

### **What information we disclose:**

In certain circumstances, we are permitted under law to disclose nonpublic personal information about you to persons and entities not affiliated with Clearview Wealth Management. For example, we may disclose nonpublic personal information about you to third party financial services like Charles Schwab or Fidelity Investments in order to open and service your accounts. Tax preparers or lawyers for the preparation of taxes and legal directives are examples of other professionals we may share information with on your behalf. We may also disclose nonpublic personal information in response to a court order, or as otherwise required by law. We do not disclose nonpublic personal information to nonaffiliated third parties for marketing purposes.

### **Security Procedures:**

We do not restrict access to nonpublic personal information about you to our associates or to those service providers who require that information in order to provide you with products and services. In all other cases, we maintain physical, electronic, and procedural safeguards which comply with industry standards to guard your nonpublic information.

## **Clearview Wealth Management Proxy Voting Policy**

In accordance with our fiduciary duties and SEC rule 206(4)-6 under the Investment Advisors Act of 1940, Clearview Wealth Management (the Firm) has adopted and implemented policies and procedures that we believe are reasonably designed to ensure that proxies are voted in the best interest of the client. Generally, the Firm votes in a manner consistent with Board recommendations. However, because we vote proxies in a way that we believe is in the best interest of our clients, we will occasionally vote against the advice of the company management.

## **Clearview Wealth Management Proxy Voting Notice**

### **Procedure:**

Unless instructed otherwise by our client, custodians (Charles Schwab & Company, Fidelity Investments and National Advisors Trust) are directed to forward proxy material to Clearview Wealth Management. Proxy materials are reviewed and voted following parameters established by the Firm that the Firm believes meets its fiduciary responsibility to the client. All voting is done electronically.

### **Recordkeeping:**

In accordance with amendments to Advisers Act Rule 204-2, Clearview Wealth Management maintains the following:

1. A copy of these policies and procedures.
2. Proxy statements received regarding client securities.
3. A record of each vote cast.
4. A copy of any material that was important in casting the vote.
5. Each written client request for proxy voting records and written response to each request.

Proxy records are maintained in accordance with required retention requirements. Clients may request a copy of these policies and procedures, which may be updated periodically, or a record of how proxies were voted by contacting our firm at 704-837-4317.

## **ADV Notice**

To comply with SEC amendments adopted in July of 2010, we will make available, an annually revised electronic copy of our Firm Brochure Part 2A Form ADV and Brochure Supplement Part 2B Form ADV. Clients are notified electronically no later than 31 May and directed to our firm's website to view or obtain the electronic copy. This electronic copy is maintained on our website for viewing at any time. The ADV can also view in the *Individual Investor* section at [www.finra.org](http://www.finra.org) by following prompts for FINRA BrokerCheck and then Investment Advisor Search.