

## PRIVACY POLICY

### Gramm-Leach Bliley Act of 1999

CIMCO (hereinafter referred to as the “Adviser”) provides a variety of investment advisory and financial planning service to clients who have contracted for these services. As a result, the Adviser is required to communicate its policies related to the privacy of customer information. We are proud of our privacy protection practices and procedures and we want you to know how we protect your information and use this information to service your account. Please take a moment to review our privacy policy as described below:

In order to facilitate the servicing of your account, the Adviser may receive nonpublic personal information about you from the following sources:

- Information we receive from you on questionnaires, applications, and account opening documents or other forms;
- Information about your transactions with us or others;
- Information we receive from a consumer reporting agency; and
- Information we received from other sources with your consent.

The type of personal information we collect and share depends on the product or service you have with us. This information can include:

- Name, address, telephone number and email address
- Social Security or Tax ID number and date of birth
- Information relating to services performed for or transactions entered into on behalf of clients (including information about brokerage accounts and transactions, such as purchases, sales, account balances, inquiries, etc.);
- Credit card or other debt and risk tolerances

We also collect your personal data any time you visit our website, request that we contact you, sign up for our content, or provide personal information to us in order to receive our services. Please Note: By accessing our website, subscribing to our content and/or requesting that we contact you, you are consenting to our collection and processing of your personal data. If you do not consent to these terms, simply do not visit our website, subscribe to our content, or request that we contact you.

We do not disclose any nonpublic personal information about you to anyone except as permitted by law. Such disclosure may include the following:

- Disclosures to affiliates, including affiliated service providers (for example, insurance agencies for processing of variable insurance application on your behalf);
- Disclosures to your chosen broker-dealer firm (for example, to establish a brokerage account on your behalf);
- Disclosures to government agencies, securities regulators and law enforcement officials (for example, for tax reporting, under a court order or to protect our legal rights);
- Disclosures to other organizations, with your consent (for example, other investment adviser firms in order to open a managed account with their firms or the brokerage firm they utilize; and
- Disclosures to other persons you authorize to obtain such information (for example, a CPA who will be preparing your tax return).

Your personal data, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever without your consent except as stated above or unless sharing your personal data is necessary to deliver a product or service you have requested from us. We reserve the right to collect and use any non-personal data made available to us by your use of our website. We further reserve the right to aggregate such data for our internal analytics, which help us improve our services.

## **FCC 10DLC Regulations**

### **Data Collection, Usage, Sharing, Protection, Data Collection & Use**

We collect your phone number and consent status to provide you with SMS services. This information is used solely for the purpose of delivering text messages related to the campaign you have opted into. We will not share your opt-in to an SMS campaign with any third party for purposes unrelated to providing you with the services of that campaign. We may share your Personal Data, including your SMS opt-in or consent status, with third parties that help us provide our messaging services, including but not limited to platform providers, phone companies, and any other vendors who assist us in the delivery of text messages. We are committed to protecting your personal information and have implemented appropriate technical and organizational measures to ensure its security. You have the right to access, correct, or delete your personal information. You can opt-out of receiving messages at any time by replying STOP. By opting into our SMS program, you agree to receive text messages from Colomb Investment Management regarding Investment Management. Message frequency may vary. Standard message and data rates may apply. Please check with your mobile provider for details. We reserve the right to modify these terms at any time.

### **Security Of Your Information**

The Adviser restricts access to your personal and account information to those of its employees who need to know that information to provide products or services to you. The Adviser maintains physical, electronic, and procedural safeguards that comply with applicable federal or state standards to guard your nonpublic personal information.

We will continue to adhere to the privacy policies and practices as described in this notice if you decide to close your account(s) or become an inactive customer.

### **Changes To Our Privacy Policy**

Our policy about obtaining and disclosing information may change from time to time. If, at any time, the Adviser adopts material changes to its privacy policies, we shall provide each client with a revised notice reflecting the changes.

### **Opting Out**

Clients cannot opt out of allowing the Adviser to collect and share certain of their nonpublic personal information with non-affiliated third parties which are necessary to service the client's accounts. You may limit us or our affiliates from marketing products or services to you based on the information that we collect and share with such affiliates. To limit marketing offers or our use of your personal data, contact us and we will work to implement your requested limitations.

### **Requests For Information**

If you have any questions concerning the Adviser's privacy policy and procedures, please feel free to contact us at (504) 520-8050 . Thank you.

Robert L. Colomb, Sr.  
Colomb Investment Management Company, LLC  
3636 S. I-10 Service Rd. W, Suite 214  
Metairie, LA 70001  
Office (504) 520-8050  
robert@colombim.com