



Customer Information Privacy Principles and Privacy Policy

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 Summit Financial Consulting, LLC (“Summit Financial”), our customers have access to a broad range of products and services. 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.

Summary

Summit Financial views protecting private information regarding its clients and potential clients as a top priority. The information collected and recorded by Summit Financial is protected by physical, electronic and procedural measures that comply with federal regulations. Only those employees who need this information to service your account or provide you with products and services are granted access. In addition, your personal and confidential information is never provided to mailing list vendors or solicitors for any purpose. Your information will be shared only with the insurance or investment organizations with which you maintain an account, and thus approved by you when signing an application or investment organization maintenance document, or as permitted by law. We do not disclose any information about our current or former clients except as permitted by law. We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk. Personal files and data are retained during the time that you are a client with Summit Financial and are stored securely for the required time as deemed by federal and state securities laws. After the required period of record retention, all information will be destroyed. If you have any questions or concerns about our privacy statement, please contact us at (586) 226-2100 or in writing at 39090 Garfield Road, Suite 105, Clinton Township, MI 48038.

Privacy Principles

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 Summit Financial. 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.

- 1. Recognition of a Customer’s Expectation of Privacy:** At Summit Financial, we believe the confidentiality and protection of customer information is one of our fundamental

Securities offered through Gradient Securities, LLC, Member FINRA•SIPC, Arden Hills, MN. Fee-based investment advisory services and insurance products offered through Summit Financial Consulting, LLC, a registered investment advisor.

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 Summit Financial.

2. **Use, Collection, and Retention of Customer Information:** Summit Financial limits 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. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income, and net worth.
3. **Maintenance of Accurate Information:** Summit Financial recognizes that it must maintain accurate customer records. Therefore, Summit Financial has 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. Gradient Securities requires client account forms to be updated every three years.
4. **Limiting Employee Access to Information:** At Summit Financial, 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 Summit Financial employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.
5. **Protection of Information via Established Security Procedures:** Summit Financial recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Summit Financial has established appropriate security standards and procedures to guard against any unauthorized access to customer information. This is most specifically handled with the use of passwords to prevent unauthorized users from accessing our database software, Advisors Assistant.
6. **Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, Summit Financial places strict limits on who receives specific information about customer accounts and other personally identifiable data. Summit Financial may share information with such companies if the client fills out an application to open an account or policy with the company. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

7. **Maintaining Customer Privacy in 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.
8. **Disclosure of Privacy Principles to Customers:** Summit Financial recognizes and respects 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 Kenneth R. Wink at (866) 508-5175 or e-mail him (at Ken@summitfc.net).

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.