

# S. P. Parkin & Co.

## Privacy Policies and Procedures

### I. Introduction

S. P. Parkin & Co. is an investment adviser registered with the state of Missouri under the Investment Advisers Act of 1940, as amended, (the “Advisers Act”). S. P. Parkin Co., Inc has adopted the following policies and procedures in order to comply with the SEC’s Privacy of Consumer Financial Information rule (commonly known as “Regulation S-P”).<sup>1</sup>

### II. Regulation S-P

Regulation S-P requires S. P. Parkin & Co. to:

- Limit when S. P. Parkin & Co. may disclose nonpublic personal information about a client to nonaffiliated third parties.
- Disclose to all clients and potential clients S. P. Parkin Co., Inc privacy policies regarding sharing such information with affiliated and nonaffiliated third parties.
- Provide a process for clients to prevent disclosure of their nonpublic personal information to nonaffiliated third parties.
- Establish procedures to ensure the protection of clients’ nonpublic personal information.

### III. S. P. Parkin & Co. Privacy Policy Statement

#### A. Individuals To Whom Privacy Policies Apply

S. P. Parkin & Co.’s privacy policies apply to any individual (natural person) from whom S. P. Parkin & Co. obtains nonpublic personal information in connection with the individual receiving a financial product or service. This individual is referred to as a “consumer” under Regulation S-P. Any individual who has received any advisory services from S. P. Parkin & Co. is a consumer for purposes of Regulation S-P. Any individual who has applied for advisory services and in the process provided nonpublic personal information to S. P. Parkin & Co. would also be considered a consumer under Regulation S-P.

A “consumer” who establishes an on-going client relationship with S. P. Parkin & Co., Inc is termed a “customer” under Regulation S-P and is entitled to full privacy protection under the rule.

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<sup>1</sup> See the Glossary of Selected Terms in Exhibit A for definitions of the selected terms used in these policies.

## B. Policy Regarding Use of Nonpublic Personal Information

S. P. Parkin & Co. treats client information that is considered “nonpublic personal information” under the terms of Regulation S-P in the same manner as it treats any confidential information provided to it by clients. Thus, irrespective of source, all nonpublic personal information regarding any individual client or potential client must be treated as confidential information and may not be disclosed except as follows:

- To other employees in connection with S. P. Parkin & Co. business;
- To an affiliate, but the affiliate may only disclose the information to the same extent as S. P. Parkin Co.
- To nonaffiliated third parties with whom S. P. Parkin & Co., Inc has a contractual agreement or other arrangement by which the nonaffiliated third parties provide services to S. P. Parkin & Co. that are “necessary to effect, administer, or enforce” the services that are authorized by the client, for example, custodial, brokerage, legal and similar services.

**Currently, S. P. Parkin & Co. has no joint marketing or servicing arrangements with unaffiliated third parties through which it shares nonpublic personal information about its individual clients or potential clients, except as necessary to carry out authorized client services. Thus, no employee shall enter into a joint marketing or servicing agreement with a nonaffiliated third party through which nonpublic personal information is shared. Any changes to this prohibition require a revision to these privacy policies and further require S. P. Parkin & Co. to provide its clients with an opportunity to opt out of the arrangement prior to the release of any nonpublic personal information to a nonaffiliated third party.**

## C. Procedures Regarding Use and Treatment of Nonpublic Personal Information

S. P. Parkin & Co. requires that its employees be aware of and sensitive to their treatment of nonpublic personal information of its clients and potential clients. S. P. Parkin & Co. prohibits its employees from discussing such information unless necessary as part of their duties and responsibilities to S. P. Parkin & Co. Furthermore, S. P. Parkin & Co. requires that each employee take precautions to avoid storing nonpublic personal information in plain view in public areas of facilities, and requires that each employee remove nonpublic personal information from conference rooms, reception areas and other areas where it may be seen by third parties. Particular care should be exercised when nonpublic personal information must be discussed in public places, such as restaurants, elevators, taxicabs, trains, or airplanes, where such information may be overheard. Under no circumstances may nonpublic personal

information be shared with any person, including any spouse or other family member, who is not an employee of S. P. Parkin & Co. and who does not have a reason to know such information.

S. P. Parkin & Co. routinely reviews its security measures, such as computer storage of nonpublic personal information, to ensure that reasonable steps are taken to safeguard such information.

#### D. Privacy Procedures

- S. P. Parkin & Co. will review this privacy policy at least annually and amend it as necessary to remain in compliance with Regulation S-P.
- Prior to entering any arrangement that involves disclosing nonpublic personal information with a nonaffiliated third party, S. P. Parkin & Co. will amend this policy and will provide an opt-out mechanism for clients to prevent such disclosure.
- At least annually, S. P. Parkin & Co. will provide notice of its then current privacy policy to each of its individual clients. (See current notice in Exhibit B.)
- S. P. Parkin & Co. will provide notice of its then current privacy policy to each individual who applies for advisory services.
- S. P. Parkin & Co. will document its compliance with its privacy policy as part of its books and records maintained under the Advisers Act and applicable rules.

#### E. Violation of Privacy Policies and Procedures

Any employee of S. P. Parkin & Co. who violates any provisions of these Privacy Policies and Procedures will face disciplinary action, including possible termination.

### IV. Summary

#### A. Importance of Compliance with Privacy Policy

It is very important that all employees adhere strictly to these Privacy Policies and Procedures. Any violations of such policies or procedures may result in serious sanctions, including dismissal from S. P. Parkin & Co. employment.

#### B. Annual Circulation/Certification

These Privacy Policies and Procedures shall be circulated at least annually to all S. P. Parkin & Co. employees and to the affiliated parties with whom S. P. Parkin & Co. shares nonpublic personal information. Each employee will be required to certify in writing that he or she has complied with S. P. Parkin & Co. Privacy Policies and Procedures (See Exhibit C.) Additionally, any consultants to or temporary employees of S. P. Parkin & Co. will also be required to review and comply with these policies and procedures. (See Exhibit D.)

C. Questions

Any questions regarding S. P. Parkin & Co.'s Privacy Policies and Procedures should be referred to S. Pat Parkin, S. P. Parkin & Co.'s Compliance Officer.

## GLOSSARY OF SELECTED TERMS

1. **Affiliate:** any entity company that controls, is controlled by, or is under common control with another entity.
2. **Consumer:** an individual or an individual's legal representative that obtains or has obtained a financial product or service to be used primarily for personal, household, or family purposes. A person becomes a consumer even if the application is withdrawn or denied. A visitor to a financial institution's website may become a "consumer."
3. **Customer:** a consumer that has an ongoing relationship with the financial institution, whereby the financial institution is providing one or more financial products or services to the consumer – e.g., an investment adviser's client, an investor in a private fund or a mutual fund shareholder.
4. **Joint Agreement:** A written contract through which one or more financial institutions jointly offer, endorse, or sponsor a financial product or service.
5. **Necessary to effect, administer, or enforce:** Disclosures that are necessary to provide the services that the consumer or customer have authorized. For example,
  - The disclosure is required, or is a usual, appropriate, or acceptable method, to carry out the transaction or the product or service business of which the transaction is a part, and record or service or maintain the consumer's account in the ordinary course of providing the financial service or financial product, or to administer or service benefits or claims relating to the transaction or the product or service business of which it is a part, and includes –
    - Providing the consumer or the consumer's agent or broker with a confirmation, statement, or other record of the transaction, or information on the status or value of the financial service or financial product; and
    - The accrual or recognition of incentives or bonuses associated with the transactions that are provided by the financial institution or any other party.
  - The disclosure is required, or one of the lawful or appropriate methods, to enforce the rights of the financial institution or of other persons

engaged in carrying out the financial transaction, or providing the product or the service;

- The disclosure is required, or is a usual, appropriate or acceptable method, in connection with –
  - The authorization, settlement, billing, processing, clearing, transferring, reconciling, or collection of amounts charged, debited, or otherwise paid using a debit, credit or other payment card, check, or account number, or by other payment means;
  - The transfer of receivables, accounts or interests therein; or the audit of debit, credit or other payment information.

6. **Nonaffiliated third party:** any entity that is not an affiliate of, or related by common ownership or affiliated by corporate control with, the financial institution, but does not include a joint employee of such institution.

7. **Nonpublic Personal Information includes:**

Any personally identifiable financial information;

- Provided by a consumer to a financial institution;
- Resulting from any transaction with the consumer or any service performed for the consumer; or
- Otherwise obtained by the financial institution.
- For example, any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available information – e.g., a list of persons (and their publicly listed telephone numbers) who have disclosed income or investment information.

**S. P. Parkin & Co.**

**Notice of Privacy Policy**

**1. What is the purpose of this Notice of Privacy Policy?**

S. P. Parkin & Co. is an investment adviser registered with the state of Missouri under the Investment Advisers Act of 1940, as amended, (the "Advisers Act"). S. P. Parkin & Co. is providing this Notice of Privacy Policy in order to comply with the SEC's Privacy of Consumer Financial Information rule (commonly known as "Regulation S-P").

More specifically, we want you to know what type of information we collect about you and how we use that information.

**2. What information do we collect about you?**

We collect the following types of nonpublic personal information about you:

- Information we receive from you on your application for advisory services and related forms.
- Information about your advisory services and brokerage transactions with us, our affiliates and third parties not affiliated with us that are used by us to provide our advisory services to you.

**3. To whom do we disclose your nonpublic personal information?**

We disclose your nonpublic personal information to only the following persons:

- The companies you authorize us to use to provide advisory services to you, for example, the custodian for your account.
- The companies we use to carry out the services you authorize us to provide, for example, brokers, our accountants, lawyers and the like.

**4. What information do we disclose about you to these parties?**

We may disclose the following kinds of nonpublic personal information about you:

- Information we receive on your application for services or client questionnaire, such as, your name, social security number, assets, and income.
- Information about the transactions in your account.

**5. How do we safeguard your nonpublic personal information?**

We restrict access to nonpublic personal information about you to those employees and service providers (like brokers and custodians) who need to know that information in order for us to carry out the advisory services that you have asked us to provide you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

**6. If I have questions about this Notice of Privacy Policy, to whom do I direct my questions?**

Questions about S. P. Parkin & Co.'s Notice of Privacy Policy should be directed to S. Pat Parkin, our Compliance Officer, who can be reached at: 314-434-1995.