



Client Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is changing the way we do business. To be successful in this environment, we must continue to ensure that our clients are confident that we will manage their affairs expertly and confidentially.

At Hughes Warren, Inc., our clients have access to a broad range of services. To deliver these services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain client information.

We want to assure all our clients that whenever information is used, it is done with discretion. The safeguarding of client information is an issue we take seriously at Hughes Warren, Inc. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our clients.

- 1. Recognition of a Client's Expectation of Privacy:** At Hughes Warren, Inc., we believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our client's trust. Thus, the safekeeping of client information is a priority for Hughes Warren, Inc.
- 2. Use, Collection, and Retention of Client Information:** Hughes Warren, Inc. limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer services and other opportunities that may be of interest to our clients. 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:** Hughes Warren, Inc. recognizes that it must maintain accurate client records. Therefore, Hughes Warren, Inc. has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests and to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Hughes Warren, Inc., employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Hughes Warren, Inc. employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.

5. **Protection of Information via Established Security Procedures:** Hughes Warren, Inc. recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Hughes Warren, Inc. has established appropriate security standards and procedures to guard against any unauthorized access to client information.
6. **Use of Electronic Communications.** At Hughes Warren, Inc. the use of electronic communications is a vital part of the communication process. We believe that this form of communication offers our clients a fast and efficient mode of providing information. Please be aware that it is possible for electronic communication to be compromised. However, we will make every effort to avoid this situation.
7. **Information We Disclose:** We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the authorized services (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, consultants, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose.

8. **Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client 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.
9. **Former Clients:** If you decide to close your account(s) or become an inactive customer, we will adhere to our privacy policies, which may be amended from time to time.
10. **Changes to Our Privacy Policy:** In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.
11. **Disclosure of Privacy Principles to Clients:** Hughes Warren, Inc. recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should call Kathy Lee Hatchett at (405) 418-4080 or e-mail her at kathy@hugheswarren.com.

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 clients.