

PRIVACY POLICY OF O'NEILL & NEYLON

We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written, or in person) with you or your authorized representatives (such as another attorney, your accountant, etc.). We also collect information about your assets, liabilities, income and expenses, and insurance policies.

WHAT INFORMATION WE DISCLOSE AND SECURITY OF YOUR INFORMATION

We do not disclose the nonpublic personal information we collect about you to anyone except in furtherance of our business relationship with you and then only to those persons necessary to provide legal services to you.

We restrict access to your nonpublic personal information to those employees and consultants (including those of our affiliated Registered Investment Advisor Family Wealth Architects LLC) who need to know that information to service your account or to provide administrative or business services on our behalf. These third parties are prohibited by written agreement with us from using or sharing the information for any other purpose.

We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy before we implement the change. If you decide at some point to terminate our services or become an inactive client, we will continue to adhere to our privacy policy, as may be amended from time to time.