

## Notice of Privacy Policies

As a client of Kelman-Lazarov, Inc., your privacy is important to us. This Notice discusses the personal information we collect about you, how we treat it, with whom we share it, and how we protect it.

We refer to nonpublic information that personally identifies you as “personal information.” We refer to a company affiliated with us as an “affiliate” and any other company as a “nonaffiliate.” The terms “you,” “your,” and “client” refer to an individual with an active advisory agreement with us; a “former client” is someone whose client relationship with us has ended. The words “we,” “us,” and “our” refer to Kelman-Lazarov.

### *Personal Information We Collect*

We collect personal information about you for a variety of purposes, including: to provide the services you request; to develop and market new services; and to fulfill legal and regulatory requirements. For example:

- **From you and forms you submit:** we collect information such as your Social Security Number; income; assets; liabilities; age; employment information; investment experience; risk tolerance; and family information;
- **From account statements and your dealings through us or the Broker-Dealer:** we collect information about you and your transactions, investments, holdings, accounts, and other information; and
- **From bank records, tax records, estate planning, credit information, and other sources:** we collect information to verify your identity or creditworthiness, meet regulatory requirements, and provide services you request.

### *How We Manage and Protect Your Personal Information*

We disclose your personal information to nonaffiliated companies, including financial service providers (securities brokers, dealers, and mutual fund companies) and non-financial companies (such as technology firms, consultants, and others) as follows:

- **Service Providers:** accounting, legal, compliance, technology, consulting, and other professional services firms that provide services for us and agree not to disclose or use the information, except to carry out the purposes for which the information is disclosed;
- **Financial Product or Service You Request or Authorize:** for our everyday business purposes, to process or service a financial product or service you request or authorize, or to maintain or service your account with us or another entity; and
- **After a Significant Business Interruption, Loss of Key Personnel, or Sale or Transfer of Our Business:** we may disclose your personal information to a prospective business partner, buyer, or successor of our business, and its legal, accounting or other professionals in connection with any business arrangement, or proposed or actual transaction.

### *Other Disclosures*

We may disclose your personal information to other third parties, as required or permitted by law, without your consent or providing you an “opt-out” right (or obtaining your “opt-in” consent, if you are a resident of California or Massachusetts), such as attorneys, trustees, or others authorized to represent you, your estate, or a joint or co-owner of your account; in response to a subpoena; to prevent fraud; or to comply with rules of, or inquiries from, industry regulators, or otherwise. Except for the disclosures to the Broker-Dealers described below, or as described above, it is our policy not to share your personal information, unless we tell you first and give you a chance to say no (or ask you to consent, if you live in California or Massachusetts--**see next page**).

### *Broker-Dealer Disclosures; Opt-Out Right*

Certain of our advisory representatives (each a “Representative”) are also registered representatives of a Broker-Dealer. Under Rules of the Financial Industry Regulatory Authority (FINRA), a Broker-Dealer must supervise the securities related activities of its registered

representatives. To facilitate such supervision, if your Representative is associated with a Broker-Dealer, then your personal information will be disclosed to the current Broker-Dealer and each other Broker-Dealer with which your Representative is now or becomes associated (collectively referred to as the “Broker-Dealers”). The current Broker-Dealer is Mutual Securities, Inc., member FINRA/SIPC; however, the Broker-Dealer may change at any time without prior notice to or approval by you, and whether or not you maintain an account with a Broker-Dealer. A Broker-Dealer may retain your personal information in its books and records. You have the right to “opt-out” of such disclosure and limit our sharing of your personal information with any or all Broker-Dealers **by calling our Toll-Free Number (see below)**, but if you do, we may be required to terminate your advisory account with us **(for residents of California & Massachusetts, you must consent (“opt-in”) before we can share your personal information with the Broker-Dealers; however, without your consent to sharing, we may terminate your advisory agreement.)**

## Safeguards to Protect Your Personal Information

We restrict access to your personal information to employees and third parties who need it to perform their responsibilities. To protect your personal information from unauthorized access and use, we have implemented physical, electronic, and procedural safeguards that comply with federal standards, including protection of your personal information in the course of its disposal. Such measures include computer safeguards and secured files and buildings.

<b>Special Notice to Residents of California or Massachusetts with Rep. Associated with a Broker-Dealer</b>	
<p>If your account has a California or Massachusetts home address, we limit sharing of your personal information to nonaffiliated third parties, and we limit such sharing of your personal information with our affiliates, except as permitted by the law of your home state. Because sharing of your personal information (including eligibility information) is necessary for the Broker-Dealers’ supervision of the Representative, <b>we request your consent (“opt-in”) to disclosure of your personal information to the Broker-Dealers. You are not required to consent, but we may be required to terminate your advisory agreement if you do not consent.</b> You may consent (“opt-in”) by <b>calling our main number (855) 273-6719</b> and speaking with a member of our Compliance staff.</p>	
<b>Privacy Policy Opt-In for Residents of California or Massachusetts if Rep. Associated with Broker-Dealer</b>	
<b>To Allow Us to Share with the Broker-Dealers, We Need Your Affirmative Consent</b>	<p><b>For Residents of California &amp; Massachusetts Only – Consent Needed for Sharing</b></p> <p>Residents of California &amp; Massachusetts must consent before we may share their personal information with the Broker-Dealers. <b><i>We are requesting your consent (“opt-in”) to sharing of your personal information with the Broker-Dealers, as described in this Notice.</i></b> To do so, you may call our main number (855) 273-6719 and speaking with a member of our Compliance Staff.</p>
<b>Privacy Policy Opt-Out for Residents of all other States if Rep. Associated with Broker-Dealer</b>	
<b>To Limit Sharing with the Broker-Dealers</b>	<p><b>All Other States – No Action Required Unless You Object to Sharing with Broker-Dealers</b></p> <p>Residents of all other states, if you object to the sharing of personal information with the Broker-Dealers:</p> <ul style="list-style-type: none"> <li>• Call our toll-free number: (855) 273-6719 and speak with a member of our Compliance staff.</li> <li>• For a <u>new client</u>, we can begin sharing your information 30 days after we send this Notice.</li> <li>• For <u>former clients</u>, we continue to share your information as described in this Notice; however, you can contact us at any time to limit our sharing.</li> </ul>
<b>Instructions Applicable to Residents of all States if Rep. Associated with Broker-Dealer</b>	
<b>What if I Limit Sharing (“opt-out”) or Consent to Sharing (“opt-in”) for an Account I Hold Jointly with Someone Else?</b>	<ul style="list-style-type: none"> <li>• Your choices will apply to everyone on your account.</li> </ul>
<b>Questions?</b>	<ul style="list-style-type: none"> <li>• Contact our Compliance staff on our toll-free number: (855) 273-6719</li> </ul>
<b>Amendments</b>	<ul style="list-style-type: none"> <li>• We may amend this Notice at any time; former clients will not be sent amended Notices; amended Notices will not apply to former clients until they receive them.</li> </ul>