



## Privacy Notice Regarding Client Privacy As Required By Regulation S-P & Regulation S-AM

### Your Privacy is Our Priority

At Streeter, Moore & Stipe LLC dba Robert Stephen Capital Management LLC, we value the confidence you have placed in us. In trusting us with your assets, you provide us with personal and financial data. Streeter, Moore & Stipe LLC is committed to maintaining the confidentiality of the personal non-public information ("personal information") entrusted to us by our customers. Your privacy is very important to us, and we are dedicated to safeguarding your personal information as we serve your financial needs.

### Our Privacy Policy

We are required to disclose Streeter, Moore & Stipe LLC's Privacy Policy and how we collect and protect your personal information. This Privacy Policy ("Policy") describes our practices and policy for collecting, sharing and protecting the personal information of our prospective, current, and former customers.

### Information We Collect

The type of personal information we collect and use varies depending on the products or services you select. We collect personal information that enables us to serve your financial needs, develop and offer new products and services, and fulfill legal and regulatory requirements. Depending on the products or services you request, we obtain personal information about you from the following sources:

- Information, such as your name, address and social security number, provided on applications and other forms we receive from you or your investment advisor representative;
- Information from your communications with Streeter, Moore & Stipe LLC or from your investment advisor representative, which may be provided to us by telephone or in writing;
- Information about your transactions, such as the purchase and sale of investments or insurance products, account balances and parties to the transactions, which we receive from our affiliates or other third parties.

### Sharing of Personal Information

We share your personal information with our affiliates so that they may process and service your transactions. However, Streeter, Moore & Stipe LLC does not sell customer lists to third party telemarketers, direct mail marketers or electronic mail marketers. Further, we do not disclose personal information to nonaffiliated third parties, except as required by law or as permitted by law to service your account, such as:

- Third-party service providers that assist us in servicing your accounts (e.g. securities clearinghouses; subadvisors, and third-party managers);
- To governmental agencies, self-regulatory organizations and law enforcement officials (e.g. valid subpoenas, court orders and to comply with regulatory inquiries);
- To financial institutions that perform marketing services on our behalf or with whom we have joint marketing agreements that provide for the confidentiality of personal information.

### Regulation S-AM

Under Regulation S-AM, a registered investment adviser is prohibited from using eligible information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of the information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out.



## **Our Security Policy**

We have procedures in place that we believe are reasonably designed to protect your personal information from unauthorized access. These include password protected user access to our computer files, training of employees, strict confidentiality policies that apply to all employees and secure access to buildings. Nevertheless, due to the Internet and Internet technologies, security and privacy risks cannot be eliminated and we cannot guarantee that information will not be disclosed in ways not otherwise described in this privacy policy.

## **Closed or Inactive Accounts**

If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

## **Questions and Complaint Notification**

Please direct questions concerning this Privacy Policy or complaints to Stephen Streeter at Streeter, Moore & Stipe LLC, 4111 S. Darlington Ave Suite 120, Tulsa, OK 74135, 918)481-6262.

The Federal Trade Commission works for the consumer to prevent fraudulent, deceptive or unfair business practices in the marketplace. You may also address complaints to the Federal Trade Commission at [ftc.gov](http://ftc.gov) or call toll free at 1-877FTC-HELP (1-877-382-4357).

## **Changes to Our Privacy Policy**

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

Thank you for choosing to invest with Streeter, Moore & Stipe LLC. We value your relationship with us.