

PRIVACY & SECURITY STATEMENT

First Western Advisors (“FWA”) is a partner in helping Clients achieve their financial goals. FWA is dedicated to providing Clients with the highest level of service and protecting their privacy. As technology continues to transform the way information is collected and distributed, we want to make sure Clients know that we have implemented a number of important practices for safeguarding the privacy and security of financial information about Clients. This Privacy Statement explains how FWA handles and protects Client information. This statement applies to consumers who are customers or former customers of FWA. FWA employs safeguards to protect Client information, to prevent fraud and to manage information. By understanding a Client’s complete relationship, FWA can provide Clients with more personalized and efficient service. FWA does not sell client information to other companies for marketing purposes. We may change this statement from time to time based on our need to accurately reflect how we gather and manage customer information. All changes to this statement will be effective upon posting on www.fwainvest.com.

How FWA Gathers Client Information

The information gathered about Clients helps FWA to better understand Client financial needs and to provide more personalized, efficient service. The information Clients provide us will allow us to process requests and transactions, to recommend investment products, or to evaluate financial needs. The information we gather comes from a variety of sources, including: (1) Information Clients provide to us (such as information on applications about assets and income); (2) Information related to Client transactions with us and our affiliates (such as account balance and payment history); (3) Information we receive from credit reporting agencies and other companies when Clients apply for a service (such as credit history); and (4) Information we obtain from others at Client request (such as information about assets held at another institution for inclusion in a financial plan). Information obtained when Clients use Internet products and services (such as application and transaction information and information contained in emails Clients send us). We carefully manage all the information gathered about Clients as described in the following section.

FWA consolidates information about Clients, including: (1) Information based on Client transactions with us (for example, information that we would consolidate from Client accounts to determine required minimum distributions) and contact information (such as name and address); (2) Non-transactional information received from others (such as credit or employment history) to evaluate Client eligibility for various financial services. Clients may tell us not to share non-transactional information with other companies. For more information, see “*Choices as a Client of First Western Advisors*” below.

We strive to maintain complete and accurate information about Clients and Client accounts. If, at any time, Clients believe that our records contain inaccurate or incomplete information, please let us know immediately. We are committed to resolving any inaccuracies as quickly as possible.

Help Protect Client Privacy

FWA trains employees to protect Client information and continually enhance security tools and processes. FWA protects client data and accounts by asking Clients for information that only Clients should know when Clients contact us. FWA follows these procedures in our offices, on the phone and via the Internet. Protecting Client information online is an essential part of our service. Our systems use technologies such as firewalls (which protect systems from intrusion) and encryption (scrambling of information) to protect Client information. Client identity is validated through confidential access codes before online access to accounts is allowed. For more information on our Internet security measures, please visit our *Internet Privacy Policy*.

Do not share account information, or passwords with others. Do not provide confidential information by telephone to unknown callers. Do not provide confidential information online unless you initiated the contact, know the party with whom you are dealing, and provide the information through a secure channel. When conducting business over the Internet, always use a secure browser and exit online applications as soon as you finish using them. Protect account records.

Choices as a Client of First Western Advisors

FWA is committed to helping Clients manage their finances effectively and enhance the returns on financial investments. For these reasons, FWA may contact Clients to offer financial advice and inform Clients of different options that may be of value. If Clients are comfortable with the ways in which they are currently contacted, there is no need to indicate preferences. FWA recognizes, however, that Clients may wish to limit the ways in which they are contacted for marketing purposes. FWA offers the options listed below:

- Please do not contact me by telephone for marketing purposes
- Please do not contact me by mail for marketing purposes
- Please do not contact me by e-mail for marketing purposes

If Clients prefer that we not share non-transactional information about them with other companies, Clients may choose to limit that sharing. Whatever a Client’s preference, FWA will honor the Clients wishes and respect the Client’s privacy. The Clients preferences will remain in effect until FWA is told otherwise. Clients do not need to notify us if they have already indicated preferences. To discuss options, inform FWA of a preference, or provide FWA with feedback, contact a FWA Financial Advisor, visit an FWA office or call us at 801-930-6500. If Clients contact FWA, FWA will assume the Client’s preferences apply to the Clients only - unless Clients tell us that the stated preferences also apply to other individuals listed on the accounts. Occasionally, we may need to contact Clients to resolve a problem or to service accounts. For example, if we observe unusual activity in Client’s account(s), Clients may be contacted to verify and confirm transactions.

Outside of First Western Advisors

With limited exceptions like those below, FWA does not provide Client information to companies outside of FWA. Clients do not need to request this confidentiality; it is our standard practice. In order to serve Client needs, we may provide all of the information we gather to: (1) Specialists that perform business operations for us (such as a client relationship management system or portfolio management software); (2) Companies that act on our behalf to market our services, or companies with whom we have entered into a joint marketing agreement in order to provide Clients with valuable financial services that FWA does not offer (such as annuities); and (3) Others only as permitted or required by law (such as to protect against fraud or in response to a subpoena).

FWA very carefully selects the companies that provide services on FWA's behalf, or offer Clients financial services that FWA does not provide. Also, FWA only provides outside companies with information that FWA believes is necessary for them to fulfill their responsibilities or to provide a financial service to the Client. These companies are prevented by legal agreement from using this information for their own purposes or selling this information to others.

FWA will not share personal information with others except as stated in this policy, unless FWA gives Clients additional notice or ask for Client permission. FWA reserves the right to disclose or report the personal information in certain circumstances: (1) to FWA's clearing firm, as FWA deems necessary or appropriate, to handle, process and clear transactions in accounts; (2) where FWA believes in good faith that disclosure is required by law, to cooperate with regulators or law enforcement authorities; (3) to perform necessary credit checks or collect or report debts owed to us; (4) to protect our rights or property; (5) upon reasonable request by a mutual fund company or relating to other investments in the Client's account. FWA does not sell its customers' or potential customers' personal information.

Links to third-party sites are provided for Client convenience. Such sites are not within our control and may not follow the same privacy, security, or accessibility standards as ours. FWA is not responsible for the products or services offered by, or the practices, content, or availability of third-party sites, their partners, or advertisers. FWA encourages Clients to review the privacy policies of third parties before providing information on such sites.

When Financial Advisors Leave First Western Advisors

FWA recognizes that the relationship with a financial advisor is important. If a Client's financial advisor's association with FWA ends and they join a non-affiliated securities broker-dealer or investment advisor, FWA will not permit the financial advisor to use certain client contact information to solicit Clients to join the financial advisor's new firm. This falls under the guidelines of the USA PATRIOT Act, where FWA is required to protect Client privacy.

Identity Theft Assistance

Monitoring Client credit for accuracy and to make sure it is being reported correctly are important steps Clients can take to protect themselves from fraud and identify theft. By law, Clients are entitled to receive 1 free credit report every 12 months from each of the nationwide consumer credit reporting companies. To learn more or request a copy of a credit report, Clients can visit www.annualcreditreport.com or call 877-322-8228. If you believe you may be a victim of identity theft:

- Contact us at 801-930-6500 to place holds on account(s);
- Contact the Social Security Administration's Fraud Hotline at 800-269-0271 to report fraudulent use of identification information;
- Report the incident as quickly as possible to each of the credit reporting agencies: Experian: 888-397-3742; Equifax: 800-525-6285 and Trans Union: 800-680-7289;
- File a police report in your local jurisdiction and retain the report number and the name of the officer who took the report; and
- File a complaint with the Federal Trade Commission ("FTC") by contacting the FTC's Identity Theft Hotline: 877-IDTHEFT.

How to Limit Direct Marketing from Other Companies

To limit the instances in which credit reporting agencies share Client information with companies wishing to offer pre-approved credit solicitations, Clients can call 888-567-8688 (the Credit Reporting Industry Pre-screening Opt Out Number), or visit www.optoutprescreen.com. To limit the marketing received from companies outside of FWA, Clients may contact the Direct Marketing Association at the addresses below and have Client's name removed from their contact lists. Clients must send the following information to DMA Mail Preference Service, PO Box 643, Carmel, NY 10512: name, address, telephone number and signature. DMA also utilizes a website to help with removal from commercial email lists. Go to www.dmaconsumers.org/optoutform_emps.shtml. Clients may also limit telemarketing calls from companies outside FWA by adding their telephone number to the *National Do Not Call List*.

If Clients Have Questions, Contact Us

FWA welcomes the opportunity to answer any questions Clients may have about this statement or the safeguarding and confidentiality of information. For more information, contact a FWA Financial Advisor, visit a FWA office, or call us at 801-930-6500.