Privacy Policy Effective Date: February 4, 2022

Our Commitment to You

NICHOLSON MEYER CAPITAL MANAGEMENT is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy"). Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. NICHOLSON MEYER CAPITAL MANAGEMENT (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. The Nicholson Meyer Capital Management does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information while servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Employment Information and or Government ID	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

Nicholson Meyer Capital Management is committed to the protection and privacy of our clients' personal and financial information. As such, we will not share such information with any nonaffiliated third party except:

- When necessary to complete a transaction in the account, such as with the clearing firm or account custodians;
- When required to maintain or service a client account;
- To resolve client disputes or inquires;
- With persons assessing compliance with industry standards, or to the attorneys, accounts and auditor of the Firm;
- With persons acting in a fiduciary or representative capacity on behalf of the client;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- When required by a regulatory agency, or for other reasons required or permitted by law;
- In any circumstances with the client's instruction or consent.

Opt-Out Provisions

It is not a policy of Nicholson Meyer Capital Management to share nonpublic personal and financial information with unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service our client accounts or is mandated by law, there are no allowances made for clients to opt out.

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (816) 931-5757 or by email at jennifer@nicholsoncap.com.