



# Buckingham

## CAPITAL MANAGEMENT

Registered Investment Advisor

# Privacy Policy

We are committed to protecting your privacy. We provide this policy as required by law to explain our information gathering and privacy practices.

Buckingham Capital Management is required to maintain compliance with privacy rules. Buckingham Capital Management is also subject to the rules of privacy imposed under the United States Securities and Exchange Commission's ("SEC") Regulation S-P or "Privacy Rule".

Buckingham Capital Management maintains compliance with privacy rules and our staff takes the issue of privacy seriously. Buckingham Capital Management realizes that providing personal information is an act of trust and we take the issue of protecting privacy very seriously.

### **Types of Information Collected**

The types of information collected during the normal course of business may vary based on the type of business conducted by may include (but is not limited to):

- Information provided from applications, forms and other information provided to us either verbally or in writing, and include but are not limited to information needed to correctly identify you and provide the services you request;
- Address, phone number, account information, social security number, employment, assets, income and debt, and beneficiary data;
- Information about your transactions, accounts, trading activity and parties to transactions;
- Tax information; beneficiary information; medical data (relating to insurance) and information from other outside sources;
- Any other information that is deemed to be nonpublic personal information or sensitive information as defined by the Gramm-Leach-Bliley Act or Regulation S-P.

### **We Do Not Sell Information**

The companies will never sell the nonpublic personal information we obtain from consumers or clients with any unaffiliated firms.

### **When Information Is Or Must Be Provided**

All information provided by clients to Buckingham Capital Management and information and advice furnished by the Adviser to clients, shall be treated as confidential and shall not be disclosed to any other person or firm, except as permitted or directed by clients by application to facilitate the services offered by the firms via an unaffiliated financial services provider, or as required by any rule or regulation of any regulatory body of which Buckingham Capital Management may be subject or as may otherwise be required by law.

For example, a court of law may subpoena records and we are required to comply. As another example, from time to time the SEC audits the records of SEC regulated firms for compliance purposes and as a result, the SEC examiners are likely to review nonpublic personal client data. Our unaffiliated broker/dealer may also monitor client and transaction information as required by FINRA, a self-regulatory organization of which they are a member.

### **If You Request That Information Be Released**

If you should specifically direct Buckingham Capital Management to release nonpublic personal information to other services providers such as your legal counsel, personal tax advisers, etc., we request that your approval to release information be provided in writing.

### **Controlled Environment**

Buckingham Capital Management maintains client records in a controlled environment and records are only available to authorized staff persons who have a need to access client information in order to deliver requested professional services, provide administrative support, or to respond to client requests.

### **Affiliated Companies**

Buckingham Capital Management shares certain information among the affiliated entities. Most often this is utilized to coordinate service efforts (such as tax preparation services for investment advisory clients). Information might also be shared for coordinated marketing efforts or for other purposes.

### **How To Opt Out**

You can direct Buckingham Capital Management not to share certain information within the affiliated companies. This is called "opting out" of information sharing. Your request can be directed to the Adviser in writing or by calling our toll free number (800) 354-6837. Your request will be promptly processed and your nonpublic information secured.

### **How Former Clients' Information is Handled and Destroyed**

Former clients are afforded the same measures of privacy protection as current clients. Records are maintained for those periods required by law or regulation and are thereafter safely destroyed via shredding.

### **Consumer Data and Destruction Policy**

If consumers provide nonpublic personal information but do not become clients of the Adviser, original documents will be promptly returned and any copies made for the Adviser will be maintained for up to one year, depending upon the likelihood of engagement, before being destroyed via in-house shredding.

Clients are encouraged to discuss any questions regarding our privacy policies and procedures directly with their representative or they can contact Jay A. Buckingham, the Chief Compliance Officer.

Linda S. Berning, CFA  
President & Chief Investment Strategist