

Customer Privacy (Regulation S-P)

Company Policy

Paul Winkler, Inc. has adopted the following policies with regard to the protection and security of client nonpublic personal information:

- Associated persons and employees will assure that the information about customers is accurate.
- Information about customers will be treated in a highly confidential manner.
- Information about customers should be available only to persons who have a need for the information to properly service a client's account, act upon a client's request or to fulfill that person's job responsibility within our company.
- Access to client information is restricted to those persons with a legitimate business need for the information.
- Selling of client nonpublic personal information to any person or entity is prohibited.
- Sharing of client nonpublic personal information and account numbers with nonaffiliated third parties other than to complete a client transaction, produce a consolidated or non-consolidated account statement, to service the account, to cooperate with regulators or law enforcement authorities, or to resolve client disputes is prohibited.
- We do not disclose client account numbers to any third parties for use in telemarketing, direct mail marketing, or other marketing through electronic mail to the consumer.
- Sharing of client nonpublic information with affiliates if the client has requested Paul Winkler, Inc. to refrain from sharing is prohibited.
- Contracts with service providers and nonaffiliated third parties will always include the agreement to maintain confidentiality of information obtained from Paul Winkler, Inc.
- We may use tools, applications, or platforms that incorporate artificial intelligence (AI) to improve our operations and enhance client service—for example, summarizing documents, organizing data, automating compliance monitoring, or responding to inquiries.
 - These tools may process limited client information in a secure and controlled environment.
 - We evaluate all technology providers, including AI vendors, to ensure they meet industry standards for data security and privacy.
- Upon employment and annually, every associated person and employee will sign an agreement to abide by Company policies on client nonpublic information.
- Physical, electronic, and procedural safeguards that comply with federal standards to guard client nonpublic personal information will be maintained at all times.

Paul Winkler, Inc. provides a written privacy notice to clients. This privacy notice conforms with the Final

Model Privacy Form of the Gramm-Leach-Bliley Act and found in amended Regulation S-P effective January 1, 2012.

Customer Notice

In order to comply with Regulation S-P and Paul Winkler, Inc.'s privacy policies:

1. The privacy notice is provided upon the inception of the relationship with the client and annually thereafter.
2. The Chief Compliance Officer will create appropriate internal control systems, including the maintenance of copies of the notices provided and documentation in client files showing compliance, and ensure appropriate supervision over compliance with Regulation S-P.
3. Upon receipt of an opt-out notification (if applicable) from a client, Paul Winkler, Inc. will send written notification to the associated person handling the account of the client's election to opt-out.
4. The Chief Compliance Officer will obtain associated persons' and employees' initial and annual agreements to abide by Paul Winkler, Inc.'s policies on client nonpublic information.

Training of Associated Persons

Paul Winkler, Inc. requires every associated person and employee to read and agree to abide by Paul Winkler, Inc.'s policy on the protection of customer nonpublic information. Upon employment and/or registration with Paul Winkler, Inc., the Chief Compliance Officer will review the following policies with the associated person:

1. The need to obtain accurate information about clients.
2. The need to treat client information in a highly confidential manner and discuss customer information with others on a need-to-know basis only.
3. Paul Winkler, Inc. considers its manual and computer records, systems, and software to be corporate assets. Associated persons and employees are responsible for protecting these assets from unauthorized use, destruction or unauthorized modification.