

The trust and confidence of our clients is important to Capital Counsel.

For this reason we are careful in the way we handle nonpublic personal information about our clients (“Client Information”). This Privacy Notice describes our policies and practices concerning Client Information and how they are designed to preserve the trust of our clients.

Information We Collect

We collect Client Information from the following sources:

- Information we receive from you on applications or other forms, such as name, address, date of birth and social security number
- Information relating to securities custody, securities transactions and account balances

Information We Disclose

We do not disclose Client Information about our present or former clients to third parties, except as permitted by law. For example, we may disclose Client Information in order to facilitate a transaction or service an account, or to comply with legal requirements.

Information Security

We restrict access to Client Information to employees and service providers who are involved in providing services to our clients. All officers and employees with access to nonpublic personal information about our clients are reminded explicitly of the need to avoid even accidental communication of confidential information to unauthorized persons or organizations. Furthermore, we maintain physical, electronic and procedural safeguards that comply with federal standards in order to protect Client Information.

CAPITAL COUNSEL LLC Investment Advisers

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