

# FERGUSON WELLMAN

## CAPITAL MANAGEMENT

## **Client Privacy Notice**

Ferguson Wellman Capital Management is a registered investment adviser who specializes in personalized asset management for individuals and families. In compliance with Securities and Exchange Commission's Privacy Regulations for Investment Advisers, we are required to provide existing customers with this privacy notice. In accordance with that regulation, the material below describes how we collect, use and safeguard the information that is provided to us.

### **The Collection of Information**

Ferguson Wellman Capital Management collects and maintains your personal information so that we may provide investment management services to you. We collect the nonpublic information about you in the following ways:

- Information we receive from you on contracts, account applications or other forms (address, social security number, and certain financial information);
- Information regarding your transactions with us, (account statements, transaction reports, trade tickets);
- Information received from you to access personal account information online (e-mail address, password).
- Email correspondence and communications sent to Ferguson Wellman

(Information collected may vary depending on the type of account opened)

#### **Information Sharing**

Ferguson Wellman Capital Management may disclose nonpublic personal information about our clients as necessary to conduct business or where disclosure is required by law:

- Third parties that administer and support our transactions (brokers, custodians);
- Third parties retained by the client for services on behalf of the client (accountants, attorneys, administrators and financial planners);
- Third parties that perform services on our behalf (outside mail house).

### **Confidentiality**

Ferguson Wellman Capital Management restricts access to nonpublic information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information. In order to maintain your complete privacy we will not disclose your personal information to anyone unless directed by you, required by law, or is necessary to provide services to you.