



The Bay City Financial Services, Inc. (BCFS) Privacy Policy

The BCFS privacy policy applies to all current and former clients. It also applies to any individual or entity where BCFS has collected personal information for the purpose of determining the appropriateness of establishing a client relationship.

1. **We do not sell your personal information to anyone.**
2. **We do not disclose personal information to third parties, unless one of the following limited exceptions applies,**
 - We disclose personal information to companies that help us process or service your transactions or provide custodial services for your portfolio.
 - We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities or resolve client disputes.

Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

3. **We do collect personal information in the normal course of business in order to administer our relationship with you and serve you better.**
 - New account application, phone conversations, annual meetings and other means. We collect information that you provide to us when you open an account; discuss your personal and financial information by phone or e-mail and during periodic meetings. The information we collect may include name, address, phone number, e-mail address, social security number, and information about your financial situation such as assets and liabilities, income, insurance issues and more.
 - Transaction information. Once you have a relationship with us, to administer your relationship and better serve you, we collect and maintain personal information about your transactions, including balances, positions, and history, and may include your name or other data in various databases.
4. **We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.**
 - For an example, we may use your personal information to provide data for the purpose of determining other services you may need.
5. **We protect the confidentiality and security of your personal information.**
 - Companies we work with or are allied with to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.
 - We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information and sign a confidentiality statement.
 - We maintain physical, electronic and procedural safeguards to guard your personal information.
6. **We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**
 - If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.
7. **We will provide notice of changes in our information-sharing practices.**
 - If, at anytime in the future, it is necessary to disclose any of your personal information in a way that is not consistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.