

FACTS

WHAT DOES HEADINVEST DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number, date of birth, addresses, personal financial reports, tax information ■ Custodian account balances, transactions, tax information ■ Wills, estate plan, insurance policies, outside asset holdings
How?	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons HeadInvest chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does HeadInvest share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes— information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes— information about your creditworthiness	No	We do not share
For nonaffiliates to market to you	No	We do not share

To limit our sharing	<ul style="list-style-type: none"> ■ Call 207-773-5333 — our menu will prompt you through your choice(s) or ■ Visit us online: www.headinvest.com <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 207-773-5333 or go to www.headinvest.com

Who we are

Who is providing this notice?

HeadInvest LLC

What we do

How does protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does HeadInvest collect my personal information?

We collect your personal information, for example, when you

- open a custodial account with a broker/dealer or
- provide account information or
- make deposits or withdrawals from your account or
- make or request a transfer

We also collect your personal information from other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes— information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- HeadInvest is not affiliated with another financial or nonfinancial company.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- HeadInvest does not share information with nonaffiliates so they can market to you.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- HeadInvest does not share information for joint marketing.

Other important information

California: Except as permitted by law, we will not share personal information we collect about California residents with Nonaffiliates and we will limit sharing such personal information with our Affiliates to comply with California privacy laws that apply to us.