

McKELVEY WEALTH MANAGEMENT, LLC

Addendum B - Notice of Privacy Practices

McKelvey Wealth Management, LLC (“MWM,” “firm,” “we,” “us,” and “our”), an investment advisory firm, is committed to safeguarding the confidential information of its clients (“client,” “you,” and “your”). We collect your non-public personal information in order to open and administer your accounts and to provide you with accurate and pertinent advice. We hold all non-public personal information you provide to us in the strictest confidence. We are prohibited under the law from changing this policy without advising you first.

We do not use your non-public personal information for marketing purposes and have no expectation of doing so in the future, either directly or through a third party marketing relationship. We will get your permission first before we share your personal information with most non-affiliated third parties. However, this does not apply to sharing information with non-affiliated third parties in connection with maintaining or servicing your account, or administering transactions requested or authorized by you. You may direct us not to make disclosures (other than disclosures required by law) regarding non-public personal information to any financial marketing partners, should we maintain any. To extent we should ever do so, we will first present you with an opportunity to opt-out of such information sharing. You also have the right to opt out of having your information shared with affiliates of MWM. If you wish to opt-out of disclosures to third parties, please contact us at (503) 709-5669.

MWM collects personal information about you from, among other sources, the following:

- applications, questionnaires or other forms;
- discussions with non-affiliated third parties;
- information about your transactions with us or others;
- tax returns and estate planning documents.

MWM uses your personal information only in the following manner:

- We do not sell your personal information to anyone.

- We limit employee access to information only to those who have a business or professional reason for knowing, and only to non-affiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We will provide you with notice of any changes in our information sharing practices. If at any time in the future it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt out of such disclosure.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- For non-affiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private.
- Federal and state regulators also may review firm records as permitted under law.
- We do not provide any of your information to mailing list vendors or solicitors for any purpose and will not do so without your permission.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information may be destroyed.