

## NOTIFICATION OF PRIVACY POLICY

At Wolverine Investment Advisors, protecting your privacy is very important to us. As a financial services firm, we collect and use nonpublic personal information (NPI) to provide our clients (prospective, current, or former) with a broad range of financial services as effectively and conveniently as possible. We are providing this notification to inform you of the types of NPI we collect, our privacy safeguards, and sharing practices. Please note that we handle all NPI in accordance with this policy.

### **WHAT IS NPI? WHAT TYPES OF NPI DOES WOLVERINE INVESTMENT ADVISORS COLLECT AND FROM WHOM DO WE COLLECT IT?**

Nonpublic personal information (NPI) is confidential personal information about you that we obtain to provide financial services or products. We generally collect nonpublic personal information about you from the following sources:

- ❖ Information we receive from you on applications or other forms (e.g., name, address, income, etc.);
- ❖ Information about your transactions with us, our service providers, or other parties to transactions; and
- ❖ Information we may receive about you from unaffiliated financial service providers and others (e.g., account custodians, attorneys, accountants, etc.).

### **HOW IS YOUR NPI UTILIZED?**

We utilize your NPI to facilitate certain transactions with our firm or specific transactions through authorized unaffiliated service providers such as account custodians (i.e., broker-dealers, mutual fund companies, etc.) chosen by mutual agreement and others who need to know such information to provide products or services to you. We may also share your NPI with other unaffiliated service providers (e.g., attorneys, accountants, etc.) that you have authorized to have access to your NPI to conduct business with you and/or on your behalf. Disclosure of NPI to such parties is unrestricted and facilitated by your agreement and express consent, except as permitted and required by law. We restrict access and sharing of your NPI to employees of our firm and only others who need to know such information as a provision of our services. In all other permissible sharing events, companies must agree to keep your information confidential and are not permitted to use or share your information for any other purpose.

### **HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

Internally, we maintain physical, electronic, and procedural safeguards to protect your NPI. Our safeguards include measures to protect your information prior to, during, and upon the termination of our financial services engagement. Moreover, we ensure that access to your NPI is limited and only accessible to those who need to know it to provide our business-related services.

### **OTHER INFORMATION SHARING**

As indicated, we may disclose your NPI to unaffiliated services providers, regulatory authorities, and law enforcement agencies. For example, we may disclose your NPI to our attorneys, accountants, auditors, or at the request of a regulatory agency in connection with the assessment of our compliance with industry standards. Wolverine Investment Advisors reserves the right to disclose or share your NPI with unaffiliated service providers described herein and as permitted by law. In the foregoing cases, these organizations must agree to keep your NPI confidential.

### **FUTURE POLICY REVISIONS**

This policy may change to reflect updates in our practices, procedures, or regulatory requirements concerning the collection and use of NPI. This notice summarizes our general privacy policy provisions, and as our client, you will receive notification of any revision or change to this policy. If you have any questions regarding our privacy policy, please do not hesitate to contact us by email: [info@wolverineinvestmentadvisors.com](mailto:info@wolverineinvestmentadvisors.com).

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**We are providing this notification to you in accordance with federal and state regulations.**