

## **Hurlow Wealth Management Group, Inc.**

### **PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY REGULATION S-P & REGULATION S-AM**

**Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Hurlow Wealth Management Group, Inc.**

**Information We Collect:** In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including but not limited to:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others.
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

**Categories of Information We Disclose:** We may only disclose information that we collect in accordance with this policy. Hurlow Wealth Management Group, Inc. does not sell customer lists and will not sell your name to telemarketers. Hurlow Wealth Management Group, Inc. does not share personal phone numbers and consent with third parties / affiliates or partners. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

**Categories of Parties to Whom We Disclose:** We will not disclose information regarding you or your account at Hurlow Wealth Management Group, Inc., except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other advisers;
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

**How We Use Information:** Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;

- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Hurlow Wealth Management Group, Inc.;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

**Regulation S-AM:** Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Hurlow Wealth Management Group, Inc. does not receive information regarding marketing eligibility from affiliates to make solicitations.

**Regulation S-ID:** Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

**Our Security Policy:** We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

**Cyber Security:** Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

**Departing Investment Adviser Representatives (“IARs”):** If your IAR’s affiliation with Hurlow Wealth Management Group, Inc. ends and he or she joins a non-affiliated securities broker-dealer or registered investment adviser, Hurlow Wealth Management Group, Inc. will permit the IAR to use certain client contact information to solicit clients to join the IAR’s new firm. The client contact information that the IAR may use is limited to your name, address, email address, phone number and account title.

Certain states have adopted a requirement for you to approve the sharing of information in advance, otherwise known as an “opt-in” choice. If you live in an “opt-in” state (e.g., California, Massachusetts, Maine, Alaska, North Dakota or Vermont), then Hurlow Wealth Management Group, Inc. will require your consent to share your information with unaffiliated third parties who are not servicing your account. State requirements vary and may change without notice.

**Succession Planning:** In the event that the owner(s) of Hurlow Wealth Management Group, Inc. retire, become incapacitated or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of Hurlow Wealth Management Group, Inc. would require your consent, as dictated by your signed agreement with Hurlow Wealth Management Group, Inc., in order to continue providing services to you.

**Your Right to Opt Out:** Federal privacy laws give you the right to restrict some sharing of your personal financial information. These laws balance your right to privacy with Hurlow Wealth Management Group, Inc.'s need to provide information for normal business purposes. With this in mind Hurlow Wealth Management Group, Inc. has taken the stance that personal financial information shall only be shared in order to conduct normal business operations. This implies that under no circumstances personal financial information shall be shared to: (1) Part of the same corporate group as your financial company (or affiliates); or (2) Not part of the same corporate group as your financial company (or non-affiliates).

In order to conduct normal business clients will not have the possibility to opt-out of sharing their personal information to the parties, as well as for the reasons disclosed above in the section Categories of Parties to Whom We Disclose, as well as the How we Use Your Information section of this privacy policy.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Complaint Notification:** Please direct complaints to: Michael Carson at Hurlow Wealth Management Group, Inc., 3925 Hagan Street, Suite 300, Bloomington, IN 47401; (812) 333-4726.

**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Hurlow Wealth Management Group, Inc., 3925 Hagan Street, Suite 300, Bloomington, IN 47401; (812) 333-4726.