Lone Peak Advisers, Inc. & Transitional Broker, LLC Privacy Policy

Privacy Policy

This notice describes the privacy policy of Lone Peak Advisers, Inc., a Registered Investment Adviser with the SEC, and Transactional Broker, LLC, a registered Broker Dealer with FINRA and the SEC (we will refer to both companies as "We" going forward). These companies are affiliated with each other through common ownership and control. As required by federal law, we are providing you with this privacy policy to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

Why We Collect Information

We are committed to protecting your privacy. We rely on access to your personal financial information to provide you with relevant information regarding the products and services we offer as well as provide you with appropriate and suitable investment recommendations. Most of this information is required for us to establish an investment account for you. We appreciate and understand that the personal financial information you have entrusted to us is sensitive and confidential.

Types of Nonpublic Personal Information We Collect

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. We obtain most information directly from you when you open an account or purchase financial products or services from us. The information we collect can include but is not limited to:

- Your name, address, telephone number, email address, social security number, date of birth, government ID information, banking information, other investment accounts, credit card Information, employment information, net worth, income, financial objectives, and investment experience.
- Information we may obtain about your creditworthiness and credit history from credit reporting agencies
- Information regarding your account balances and the types of products and services you prefer through your interactions and transactions with us.

Information We Disclose

We do not disclose nonpublic personal information about our clients with non-affiliated third parties unless such disclosure is necessary to manage and service your account; or when required by law. Any non-affiliated third party service provider that we use will be bound by confidentiality to not disclose the information provided by us and only use this information to perform the specific services for our clients. For example, we may provide access to information about you to non-affiliated third parties in certain limited circumstances, including:

- To establish an account on behalf of our clients at one of our approved custodians.
- To provide asset management services for your account by a third party asset manager.
- To help us manage, service, and process transactions for your account(s).
- To provide account related services such as printing, mailing, and data processing services.

• When we are required or permitted under law. (i.e. disclosing your personal information to cooperate with regulatory authorities or law enforcement), reporting tax-related information to federal and state governments, performing credit/authentication checks, or for risk management.

We may share nonpublic personal information internally to the appropriate personnel for the ongoing servicing and management of our clients, as well as share this information with our affiliates under common ownership or control to offer a more complete financial services solution and experience for our clients, as well as for joint marketing purposes.

Opting-Out of Third Party Disclosures

Federal law gives consumers the right to limit some but not all information sharing. If the Financial Professional servicing your account(s) leaves to join another financial institution, the Financial Professional may retain copies of your personal information so that he or she can continue to serve you at their new firm. In doing so, your Financial Professional may share your information with the new firm for purposes of establishing an account with that firm, but is otherwise required to keep confidential the personal information obtained from you while he was affiliated with us, and they may use your information only to service your account(s). If you wish to limit this sharing please contact us at 801-855-8886.

Information Security

We are committed to preventing others from obtaining access to your customer information, and we maintain procedures and technology designed for this purpose. We take several steps to protect the customer information we have about you, including the following:

- We maintain physical, electronic and procedural safeguards to protect your information;
- We restrict access to information about you to those employees who need to know that information to provide you with the best possible products and services;
- We require outside companies and independent contractors to whom we provide customer information
 for marketing, servicing or processing purposes to enter into a confidentiality agreement that restricts
 the use of such information to be used for specific purposes as intended, and prohibits the independent
 use of such information;
- We update and test our technology on a regular basis in order to improve the protection of customer information;
- We have internal procedures that limit access to customer information to only those members who are considered "authorized" personnel.
- We do not sell our client's personal information to anyone for any reason

Questions

If you have any questions about your personal or account information or about Lone Peak Advisers/Transitional Broker, privacy policies and practices, please feel free to contact us at: 801-855-8886