



## **PRIVACY NOTICE**

Johnson Lyman Wealth Advisors (referred to as "JOHNSON LYMAN") maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information ("information"). Such information may include, but is not limited to, records pertaining to personal background, investment objectives, financial situation, tax information and returns, investment holdings and transactions, Social Security numbers, account numbers and balances, credit history and sources. Through this policy and its underlying procedures, JOHNSON LYMAN attempts to secure the confidentiality of all client information and to protect it against anticipated threats or hazards to the security or integrity of that information.

It is the policy of JOHNSON LYMAN to restrict access to all current and former clients' information to those employees and affiliated or nonaffiliated third-party service providers who need to know that information to provide JOHNSON LYMAN's services to those clients. JOHNSON LYMAN may disclose a client's information if JOHNSON LYMAN is: (1) previously authorized by the client to disclose that information to individuals and/or entities not affiliated with JOHNSON LYMAN, including, but not limited to, the client's other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by JOHNSON LYMAN in order to facilitate the commencement, continuation, or termination of a business relationship between the client and a nonaffiliated third-party service provider of JOHNSON LYMAN (e.g., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for JOHNSON LYMAN (e.g., advisory agreement, client information form, account application, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

JOHNSON LYMAN permits only authorized employees who have signed a copy of JOHNSON LYMAN's Privacy Policy to have access to client information. Employees violating JOHNSON LYMAN's Privacy Policy will be subject to JOHNSON LYMAN's disciplinary process. Additionally, whenever JOHNSON LYMAN hires and shares client information with other non-affiliated service providers to support the provisioning of services to JOHNSON LYMAN's clients, JOHNSON LYMAN will require those service providers to sign a confidentiality agreement (such

agreement may be included in the service provider's contract with JOHNSON LYMAN) which restricts any further sharing of the client's information to (as a minimum standard) the same basis as is described in this notice.

JOHNSON LYMAN does not: (1) share any client information (e.g., information about client credit worthiness) with credit reporting agencies, or (2) share any client information to non-affiliated third parties for marketing purposes. Federal law allows clients of financial firms to limit these two kinds of sharing, but since JOHNSON LYMAN's privacy policy already prohibits these forms of sharing, such rights are not applicable for clients of JOHNSON LYMAN.

**Should you have any questions regarding the above, please contact  
Robert A. Lyman, CFP®, Chief Compliance Officer.**