

FIRST WESTERN ADVISORS

6440 South Millrock Drive, Suite 150 Holladay, Utah 84121 • Phone: 801.930.6500 • Fax: 801.930.6501

Privacy & Security Statement

First Western Advisors is your partner in helping you achieve your financial goals. We are dedicated to providing you with the highest level of service and protecting your privacy. As technology continues to transform the way information is collected and distributed, we want to make sure you know that we have implemented a number of important practices for safeguarding the privacy and security of financial information about you.

- We employ safeguards to protect client information and to prevent fraud.
- We carefully manage information about you. By understanding your complete relationship with us, we can provide you with more personalized and efficient service.

We do not sell client information to other companies for marketing purposes.

You Have Choices

- You may direct us not to contact you for marketing purposes by:
 - Telephone,
 - Direct mail or
 - E-mail.

You may direct us not to share, within First Western Advisors, non-transactional information about you (such as credit or employment history) that we receive from others.

How to Reach Us to Exercise Your Choices

- Contact your First Western Advisors Financial Advisor or visit a First Western Advisors office. Call us at 801-930-6500 to speak to a representative.

How You Can Help Protect Your Privacy

- Do not share your account information, or passwords with others.
- Do not provide confidential information by telephone to unknown callers.
- Do not provide confidential information online unless you initiated the contact, know the party with whom you are dealing, and provide the information through a secure channel.
- When conducting business over the Internet, always use a secure browser and exit online applications as soon as you finish using them.
- Protect your account records.

If you believe you are a victim of fraud or identity theft, please contact us at 801-930-6500 for assistance, such as to put holds on your accounts. Also, see the Identity Theft Assistance section of our Privacy Statement below.

About This Statement

This Privacy Statement explains how First Western Advisors handles and protects customer information. This statement applies to consumers who are customers or former customers of First Western Advisors.

We may change this statement from time to time based on our need to accurately reflect how we gather and manage customer information. All changes to this statement will be effective upon posting on <http://www.fwainvest.com>.

How We Secure Your Assets and Protect Information About You

- We train our employees to protect client information.
- We continually enhance our security tools and processes.

We protect client data and accounts by asking you for information that only you should know when you contact us. We follow these procedures in our offices, on the phone and via the Internet.

How We Protect Your Privacy Online

Protecting client information online is an essential part of our service to you.

- Our systems use technologies such as firewalls (which protect systems from intrusion) and encryption (scrambling of information) to protect client information.

We validate your identity through confidential access codes before we allow online access to your accounts.

For more information on our Internet security measures, please visit our [Internet Privacy Policy](#).

How We Gather Information to Understand Your Financial Needs

The information we gather about you helps us to better understand your financial needs and to provide more personalized, efficient service to you. For example, the information you give us will allow us to process your requests and transactions, to recommend investment products, or to evaluate your financial needs.

The information we gather comes from a variety of sources, including:

- Information you provide to us (such as information on applications about assets and income)
- Information related to your transactions with us and our affiliates (such as account balance and payment history)
- Information we receive from credit reporting agencies and other companies when you apply for a service (such as your credit history)
- Information we obtain from others at your request (such as information about assets held at another institution for inclusion in a financial plan)

Information obtained when you use Internet products and services (such as application and transaction information and information contained in e-mails you send us)

We carefully manage all the information gathered about you as described in the following section.

How We Manage Information to Serve Your Needs

We consolidate information about clients, including:

- Information based on your transactions with us (for example, information that we would consolidate from your accounts if you wished to make an automatic mortgage payment from your checking account) and contact information (such as your name and address)

Non-transactional information received from others (such as credit or employment history) to evaluate your eligibility for various financial services (for example, a line of credit at a special rate)

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You may tell us not to share non-transactional information with other companies*. For more information, see the section below entitled, "Your Choices as a Client."

Outside of First Western Advisors:

With limited exceptions like those below, we do not provide client information to companies outside of First Western Advisors. You do not need to request this confidentiality; it is our standard practice.

In order to serve your needs, we may provide all of the information we gather to:

- specialists that perform business operations for us (such as check printing)
- companies that act on our behalf to market our services, or companies with whom we have entered into a joint marketing agreement in order to provide you with valuable financial services that we do not offer (such as annuities)

others only as permitted or required by law (such as to protect against fraud or in response to a subpoena)

We select very carefully the companies that provide services on our behalf, or offer you financial services that we do not provide. Also, we only provide them with information that we believe is necessary to fulfill their responsibilities or to provide a financial service to you. These companies are prevented by legal agreement from using this information for their own purposes or selling this information to others.

First Western Advisors will not share personal information with others except as stated in this policy, unless we give you additional notice or ask for your permission. First Western Advisors reserves the right to disclose or report the personal information in certain circumstances: (1) to First Western Advisor's clearing firm, as First Western Advisors deems necessary or appropriate, to handle, process and clear transactions in accounts; (2) where we believe in good faith that disclosure is required by law, to cooperate with regulators or law enforcement authorities; (3) to perform necessary credit checks or collect or report debts owed to us; (4) to protect our rights or property; (5) upon reasonable request by a mutual fund company or relating to other investments in your account.

First Western Advisors does not sell its customers' or potential customers' personal information.

When Financial Advisors Leave First Western Advisors:

We recognize that your relationship with your financial advisor is important. If your financial advisor's association with First Western Advisors ends and he/she joins a non-affiliated securities broker-dealer, First Western Advisors will not permit the financial advisor to use certain client contact information to solicit clients to join the financial advisor's new firm. This falls under the guidelines of the USA PATRIOT Act where we are required to protect your privacy as a client.

Your Choices as a Client

We are committed to helping you manage your finances effectively and enhance the returns on your financial investments. For these reasons, we may contact you to offer financial advice and inform you of different options that may be of value to you. If you are comfortable with the ways in which we contact you currently, there is no need to indicate your preferences. We recognize, however, that you may wish to limit the ways in which we contact you for marketing purposes and we offer the options listed below:

Please do not contact me by telephone for marketing purposes.

Please do not contact me by mail for marketing purposes.

Please do not contact me by e-mail for marketing purposes.

You also have a choice about how information about you is managed within First Western Advisors. If you prefer that we not share non-transactional information about you with other companies, you may choose the following option:

Please do not share, among other companies, non-transactional information about me that you receive from others.

Whatever your preferences, we will honor your wishes and respect your privacy. Your preferences will remain in effect until you tell us otherwise. You do not need to notify us if you have already indicated your preferences to us.

To discuss your options, inform us of a preference, or provide us with feedback, contact your First Western Advisors Financial Advisor, visit a First Western Advisors Office or call us at 801-930-6500. If you contact us, we will assume your preferences apply to you only - unless you tell us that they also apply to other individuals listed on your accounts.

Please note that we are committed to providing you with superior service. Occasionally, we may need to contact you to resolve a problem or to service your accounts. For example, if we observe unusual activity on your debit card, we may contact you to verify your purchases and confirm that they are authorized.

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Identity Theft Assistance

Monitoring your credit for accuracy and to make sure it is being reported correctly are important steps you can take to protect yourself from fraud and identify theft. By law, you are entitled to receive one free credit report every 12 months from each of the nationwide consumer credit reporting companies (see below). To learn more or request a copy of your credit report, you can visit <https://www.annualcreditreport.com> or call 877-322-8228.

If you believe you may be a victim of identity theft:

Contact us at 801-930-6500 to place holds on your accounts.

Contact the Social Security Administration's Fraud Hotline at 800-269-0271 to report fraudulent use of your identification information.

Report the incident as quickly as possible to each of the credit reporting agencies:

Experian: 888-397-3742

Equifax: 800-525-6285

Trans Union: 800-680-7289

File a police report in your local jurisdiction and retain the report number and the name of the officer who took the report.

File a complaint with the Federal Trade Commission (FTC) by contacting the FTC's Identity Theft Hotline: 877-IDTHEFT.

How to Limit Direct Marketing from Other Companies

To limit the instances in which credit reporting agencies share your information with companies wishing to offer you pre-approved credit solicitations, you can call 888-567-8688 (the Credit Reporting Industry Pre-screening Opt Out Number), or visit <https://www.optoutprescreen.com>. To limit the marketing you receive from companies outside of First Western Advisors, you may contact the Direct Marketing Association at the addresses below and have your name removed from their contact lists. You must include your name, address, telephone number and signature with your request.

DMA Mail Preference Service
PO Box 643
Carmel, NY 10512

DMA also utilizes a website to help you get off commercial email lists. Click on the following link: [DMA's Email Preference Service](http://www.dmaconsumers.org/optoutform_emps.shtml) or go to http://www.dmaconsumers.org/optoutform_emps.shtml.

You may also limit telemarketing calls from companies outside First Western Advisors by adding your telephone number to the [National Do Not Call List](#).

We Strive to Maintain Accurate Information

We strive to maintain complete and accurate information about you and your accounts. If, at any time, you believe that our records contain inaccurate or incomplete information about you, please let us know immediately. We are committed to resolving any inaccuracies as quickly as possible.

Credit Reporting Agencies

If you believe we have reported inaccurate information about your account to any credit reporting agency, please let us know in writing. Be sure to include your complete name, current address, Social Security Number, telephone number, account number, type of account, specific item of dispute and the reason you believe the information is wrong. Send your notice to: First Western Advisors, 6440 So Millrock Drive, Suite 150, Holladay, UT 84121. We will investigate your concern and correct any inaccuracies we find. We will inform you of any actions we take.

Security Standards

Protecting your personal information online is vital. We go to great lengths to see that your transactions and personally identifiable information are confidential, secure, and protected from loss, misuse, alteration or destruction. To read about the technology that keeps your personal information private and how you can help protect your personal information, visit our [Internet Privacy Policy](#).

If You Have Questions, Contact Us

We welcome the opportunity to answer any questions you may have about this statement or the safeguarding and confidentiality of your information. For more information, please read our [Internet Privacy Policy](#) section, contact your First Western Advisors Financial Advisor, visit a First Western Advisors office, or call us at 801-930-6500 to speak to a representative.