

CHARLES A. LILES & ASSOCIATES, INC.

Client Privacy Policy

Charles A. Liles & Associates, Inc. ("CALA") is dedicated to maintaining high standards of client confidentiality recognizing that clients provide us with private financial and personal information. We are committed to maintaining the confidentiality of that information and will not compromise established relationships between CALA and our clients by disclosing personal information to any third party for independent use. Our clients are not only protected by federal and state laws, but by our unwavering commitment to our Client Privacy Policy.

CALA cares about each client and considers the privacy of each client's personal information to be an important element of public confidence and trust. We are committed to safeguarding that information. Our goal is to keep your information strictly confidential.

CALA will not collect or retain any client information unless we have a legitimate business purpose to do so.

We receive a great deal of information about our clients. Some information comes directly from them on applications and forms. This information might include their name, address, social security number, birth date, assets, income and accounts at other financial institutions. We also accumulate information in the course of our business relationships and transactions with them and have learned that the more we know about our clients, the better we can understand their often unique needs and thus provide them with superior advisory services.

CALA only gathers this information about our clients if we believe it is necessary or useful as part of our relationship with them, if it will serve their interests, if it will help us provide them with products and services to meet their needs, or if it is required by law or regulation.

We do not disclose any nonpublic personal information about our clients or former clients to anyone except as permitted by law. For example, we are required to share a client's financial information with parties named in a lawsuit or administrative action when we are served with a subpoena or court order. We also share information with federal or state regulatory authorities as mandated by federal or state law.

We may contract with outside service providers such as unaffiliated money managers, custodians and brokerage firms to prepare account statements, manage portfolios, furnish software services or provide financial products. Where necessary, we will disclose information we have about clients to these third parties. In all such cases, we provide the third party with only the necessary information to carry out its assigned responsibilities and only for that purpose. These outside service providers agree to comply with our client confidentiality requirements and must abide by applicable laws.

CALA is committed to maintaining complete and accurate information about our clients and employs strict measures, consistent with reasonable commercial standards, to ensure the accuracy, timeliness and thoroughness of client information. If clients believe any information we have about them may be incorrect, they should immediately notify us and we will take prompt action to make all necessary corrections.

Keeping financial information secure is one of our most important responsibilities. We value our clients' trust and handle information about them with care. We limit access to client information to those employees who need to know that information to provide or maintain a client's products and services.

We maintain physical, electronic and procedural safeguards to protect confidential information and continually assess new technology for protecting information and upgrade our systems when appropriate.

To protect client privacy, CALA cannot accept communications from someone claiming to represent one of our clients unless he or she has been properly authorized in writing to represent them.

If a client should end his or her relationship with us, we will continue to adhere to the information policies and practices described in this policy.

We are required by federal law to provide clients with a copy of this Privacy Policy at least annually, but will do so more often as policies and safeguards evolve.

Please contact Charles Liles, President, at 317-566-2106 or cliles@lilesassociates.com if you have any questions about this Policy.