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## Notification of Privacy Policy

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At Woodward Investment Management, LLC, protecting your privacy is very important to us. As a financial services firm, we collect and use nonpublic personal information (NPI) in order to provide our clients (prospective, current, or former) with a broad range of financial services as effectively and conveniently as possible. We are providing this notification to inform you of the types of NPI we collect, our privacy safeguards and sharing practices. We handle all NPI in accordance with this policy.

### **WHAT IS NPI? WHAT TYPES OF NPI DOES WOODWARD INVESTMENT MANAGEMENT, LLC COLLECT AND FROM WHOM DO WE COLLECT IT?**

Nonpublic personal information (NPI) is confidential personal information about you that we obtain in connection with providing financial services or products to you. We generally collect nonpublic personal information about you from the following sources:

- ❖ Information we receive from you on applications or other forms (e.g., name, address, income, etc);
- ❖ Information about your transactions with us, our affiliates, our service providers, or other parties to transactions; and
- ❖ Information we may receive about you from unaffiliated financial service providers (e.g. custodians, insurance agents, attorneys, and consumer reporting agencies).

### **HOW IS YOUR NPI UTILIZED?**

We do not disclose any nonpublic personal information (NPI) about you without your express consent, or except as described in this notice. We only share your nonpublic personal information with (1) employees of our firm or any company affiliated with our firm; (2) affiliates of our firm, (3) unaffiliated entities that either perform services for us or function on our behalf (such as check printing, account aggregation, broker dealer, custodial, investment company, and insurance services); (4) account aggregation services chosen by mutual agreement; and (5) others who need to know such information in order to provide products or services to you and (6) any other situation where we are permitted or required by law to share it. We will also receive nonpublic personal information from some or all of the entities listed above. Disclosure of nonpublic personal information to such parties is unrestricted and facilitated by your agreement and consent.

### **HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information. Our safeguards include measures to protect your information prior to, during and upon termination of our financial services engagement (i.e., disposal of your data).

### **DISCLOSING PERSONAL INFORMATION TO NON-AFFILIATED THIRD PARTIES**

We do not sell, share or disclose your personal information to persons or entities that are neither service providers nor affiliates. We will not share or disclose such information to non-affiliated third-party marketing companies.

### **FUTURE POLICY REVISIONS**

This policy may change to reflect updates in our practices, procedures, or regulatory requirements concerning the collection and use of NPI. As our client, you will receive notifications at least annually and our revisions or changes to this policy will be highlighted in our annual notifications. If you have any questions regarding our privacy policy, please do not hesitate to contact your investment advisor representative or you may write to, email, or call us at:

**Woodward Investment Management, LLC**  
**1616 Arlington Street**  
**Houston, Texas 77008**

**Firm Contact: Madison Woodward**  
**Phone: 832-689-3024**  
**Email: [madison@woodwardim.com](mailto:madison@woodwardim.com)**

*We are providing this notification to you in accordance with Federal and State regulations.*