

Privacy Policy

Policy

As a registered investment adviser, Speece Thorson Capital Group must comply with SEC Regulation S-P (or other applicable regulations), which requires registered advisers to adopt policies and procedures to protect the “nonpublic personal information” of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information. Speece Thorson Capital Group must also comply with the California Financial Information Privacy Act (SB1) if the firm does business with California consumers. Pursuant to Title V of the Gramm-Leach-Bliley Act of 1999 and its regulations, Speece Thorson Capital Group, Inc. sets forth the following policies regarding its privacy policy. Speece Thorson Capital Group, Inc. is committed to maintaining the highest standards of confidentiality, integrity and security of your personal and financial information. In that regard, we are providing our Privacy Policy to all of our individual clients who obtain investment services from us for personal, family or household purposes, in accordance with Title V of the Gramm-Leach-Bliley Act of 1999 and its implementing regulations. This Privacy Policy Notice serves as a standard for all Speece Thorson Capital Group employees in the collection, use, retention and security of individual customer information.

The Information We Collect About Our Clients

The non-public personal information we collect about our clients comes primarily from the data our clients provide to us to perform investment services for their account(s), and information about their assets with us.

Our Disclosure Policies

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. Nonpublic personal information includes nonpublic “personally identifiable financial information” plus any list, description or grouping of clients that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by Speece Thorson Capital Group to clients, and data or analyses derived from such nonpublic personal information. As is common in the investment management industry, we use a third-party transfer agent and a third-party provider of back-end systems for our business who only use our clients' information to process transactions we have authorized for them. Our contracts with these organizations contain a confidentiality clause that prohibits the sale or any other use of our clients' personal information.

Our Information Security Policies

We limit access to our clients' information to those of our employees and service providers who are involved in offering or administering the services we offer. We maintain physical, electronic and procedural safeguards that are designed to comply with federal standards to guard our clients' information.