

**McINTYRE, FREEDMAN & FLYNN INVESTMENT ADVISERS, INC.
2019 PRIVACY STATEMENT**

McIntyre, Freedman & Flynn Investment Advisers, Inc. (öThe Companyö) recognizes and appreciates the importance of respecting the privacy of our clients. We are committed to safeguarding against unauthorized disclosure of, or access to, client information. This Privacy Statement sets forth The Company's current policies and practices with respect to nonpublic personal information of our clients and former clients. Please be aware that we may change this policy periodically. If we do, we will notify you.

The Company limits the collection, retention and use of individual client information to the minimum amount required to properly serve you. We may collect, directly and from applications or other forms, personal nonpublic information about clients, such as name, address, social security number, information about our clients' finances and transactions with The Company and its affiliates.

The law permits us to share, and The Company will share, the information described above with unaffiliated third parties that provide processing and support services on our behalf. Otherwise, unless we have your consent, we will not share your personal information except as permitted by law.

The Company emphasizes to our employees the confidential nature of client information and the high level of importance that we place on maintaining confidentiality. The Company restricts access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. To the extent that we outsource processing functions and support services to unaffiliated third parties, we limit the information available to them to information necessary or appropriate to offer such processing and support services. The Company requires that these third parties hold the information that we provide in confidence, subject to our security standards and only for approved purposes.

In addition to protecting your privacy, McIntyre, Freedman & Flynn Investment Advisers, Inc., is committed to keeping your nonpublic personal information secure. We are satisfied that all of our service providers maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

Sincerely,

McIntyre, Freedman & Flynn Investment Advisers, Inc.
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