



Privacy Policy

As of March 1, 2018

We consider the protection of your sensitive personal information to be an important priority. Our privacy policy and practices are designed to support this objective. We want our customers to understand what information we collect and how we use it.

We may collect nonpublic personal and financial information about our clients from the following sources:

- Information we receive from you on applications, forms and other documents;
- Information about your transactions with us, our affiliates or others; and
- Information from a consumer-reporting agency, if so applicable.

We do not disclose any nonpublic personal information about our current or former customers to anyone, except in the following circumstances:

- As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Charter Oak Asset Management, Inc., or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud, identity theft and unauthorized transactions.

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with accepted standards to guard your nonpublic personal information.

Should you have any questions regarding this policy, please contact Robert S. Malik, President, at (203) 272-3597.
