

PRIVACY POLICY

FACTS

WHAT DOES COLDSTREAM DO WITH YOUR PERSONAL INFORMATION

Why?	Financial companies choose how they are sharing your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and birthdates • Risk Tolerance and investment experience • Your net worth/annual income; wire transfer instructions and transaction history • Your tax income and related tax data <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share client(s) personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client(s) personal information; the reasons Coldstream chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Coldstream share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes – to offer products and services to you	YES	NO
For joint marketing with other financial companies	NO	WE DO NOT SHARE
For our affiliates' everyday business purposes – information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes – information about your creditworthiness	NO	WE DO NOT SHARE
For our affiliates to market to you	NO	WE DO NOT SHARE
For nonaffiliates to market to you	NO	WE DO NOT SHARE

Questions?	Call 800.665.1936 or go to www.coldstream.com
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Who we are	
	Coldstream Holdings, Inc. is the parent company of Coldstream Capital Management, Inc. dba Coldstream Wealth Management, Coldstream Securities, Inc., CHI Life Insurance, Inc., FIT Insurance dba Coldstream Risk Management, The Rainier Group Inc. dba Coldstream Capital Partners, Hersman Serles Almond, LLC dba Coldstream Tax & Consulting, and Seidman Insurance Consultants, LLC. Ascent Capital LLC is a sub-entity of Coldstream Capital Management, Inc.
What we do	
How does Coldstream protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We maintain physical, electronic and procedural safeguards to guard our customers' nonpublic personal information.
How does Coldstream collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> • Execute an Advisory contract with Coldstream Wealth Management • Open a custodian account or deposit/wire money • Invest in a private fund or request financial planning services • Engage us for Tax & Consulting services
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you • Sharing for nonaffiliates to market to you State laws and individual firms may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include Coldstream Capital Management, Inc. dba Coldstream Wealth Management, Coldstream Securities, Inc., CHI Life Insurance, Inc., FIT Insurance dba Coldstream Risk Management, The Rainier Group Inc. dba Coldstream Capital Partners, Hersman Serles Almond, LLC dba Coldstream Tax & Consulting, and Seidman Insurance Consultants, LLC. Ascent Capital LLC is a sub-entity of Coldstream Capital Management, Inc.
Nonaffiliates	Companies not related by common ownership or control. They can be financial or nonfinancial companies. We share information with nonaffiliates which can include qualified custodians and broker dealers, investment advisors, mutual fund and hedge fund administrators. Examples of other firms who provide support services may be Portfolio Accounting and Reporting, Portfolio Rebalancing and Trading, and Customer Relationship Management (CRM) systems.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Coldstream does not jointly market.
Other important information	
<p>Coldstream does not sell your private information to anyone or share your personal information with third parties unless you have specifically asked us to do so. Third party companies we use to provide outside support services are not allowed to use information about our clients for their own purposes and are contractually obligated to maintain strict confidentiality. We maintain limits on their access to our internal information, only providing information necessary to complete the requested services.</p> <p>This notice applies to individuals who are clients or former clients. This notice replaces all previous notices of our privacy policy, and may be amended at any time. We will keep you informed of changes as required by law.</p>	