

Oxford is committed to respect the individual privacy of our clients and prospects. In accordance with federal regulations, Oxford is providing this notice to disclose how we use information about you or your accounts.

This notice applies to Oxford Financial Group, Ltd. (“Oxford”) and The Trust Company of Oxford (“TCO”). Reference to Oxford includes TCO.

### *Our Commitment to You*

As an Oxford client, you have entrusted to our care your personal and financial data. We recognize that your relationship with us is based upon trust and that you expect us to act responsibly and in your best interest. Because your personal and financial data is your private information, we hold ourselves to the highest standards in its safekeeping and use. This means, most importantly, that we do not sell client information – whether it is your personal information or the fact that you are an Oxford client – to anyone. Instead, your information is used by us primarily to provide you with financial advice, to complete transactions that you request, or to make you aware of other financial services we offer.

### *The Information We Collect About You*

We obtain non-public personal information about you from the following sources:

- Information we receive from you or your representative, such as information on applications or other forms that may include your name, address, social security number, birth date, assets, income, and accounts at other institutions.
- Information about your transactions with us, our affiliates, or others, such as your account balance and investment activities.
- Information we receive from insurance companies, agencies, your personal accountant and attorney, such as your insurance coverage, income taxes, estate affairs and family circumstances.

### *How We Handle Your Personal Information*

As emphasized above, we do not sell information about current or former clients or their accounts to third parties. Nor do we share such information, except when needed to complete transactions at your request or to make you aware of related financial services that we offer. Here are the details:

- In order to complete certain transactions or to provide you with the financial information or services that you request or authorize, it may be necessary for us to provide non-public personal information to companies, individuals, or groups that are not affiliated with Oxford. For example, the implementation and administration of your financial plan may require Oxford to provide non-public personal information to unaffiliated money managers, custodians, brokerage firms and insurance companies that you have selected based upon our recommendations to you.
- In order to alert you to other Oxford financial services, we may share your information within the Oxford family of affiliated companies. This would include, for example, sharing your information within Oxford to make you aware of trust services offered through Oxford’s trust company.
- In certain instances, we may contract with non-affiliated companies to perform services for us. Where necessary, we will disclose information we have about you to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. Also, we require these third parties to treat your private information with the same high degree of confidentiality that we do.
- Finally, we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances. For example, we may share personal information about you to: protect your accounts from fraud, respond to a subpoena, or service your accounts.

### *How We Safeguard Your Personal Information*

We restrict access to information about you to those Oxford employees who need to know the information to provide services to you. We maintain strict physical, electronic and procedural safeguards to comply with federal standards to guard your non-public personal information. We have a comprehensive training program and perform background checks for all newly-hired employees. We also conduct compliance training at least annually.

### *We Keep You Informed*

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time, but you may rest assured that if we do change it, we will notify you promptly. If you have questions pertaining to this Notice, please contact Matthew Mohlman, Director, Compliance & Legal Affairs at (317) 805-5089.