



INVESTMENT ADVISORS

PRIVACY POLICY

The Securities and Exchange Commission issued its final rule regarding the obligation of registered investment advisors and other securities firms to protect the financial privacy of their customers. The rule, Regulation S-P, implements the privacy requirements of the financial modernization legislation entitled the Gramm-Leach-Bliley Act, and was signed into law on November 12, 1999.

Our relationships with our clients are our most important asset. KCM clients entrust us to manage the assets also entrust us with the personal and financial data of those clients (“Client” includes current clients, former clients or prospective clients). Information that personally identifies clients or their investment accounts is “personal information.” We consider client personal information to be private and confidential, and we hold ourselves to the highest standards of trust and fiduciary duty in the safekeeping and use of personal information.

As part of our investment management business, we collect nonpublic personal financial information about a client from account applications or other forms and through client documents with us or through a broker, which may include information about account balances, securities positions, or financial products purchased. We obtain information from third parties with respect to a client’s account such as trade confirmations from brokerage firms and custodial statements.

We use information about clients and their accounts to help us better serve their investment and financial needs and to administer our business. We restrict access to this information to authorized individuals within our firm who need to know this information to provide our services. We maintain physical, electronic, and procedural safeguards that protect personal, nonpublic information. Employees do not share this information outside the firm. We do not disclose or sell personal information to anyone.

We collect nonpublic personal information about clients from the following sources:

- *Account applications and other forms*, which may include the client’s name, address, social security number, and information about his or her unique circumstances and investment preferences.
- *The client’s financial planner* and related advisory professionals (attorney or CPA) who may provide financial, investment history and tax information about a client.
- *The investment custodian*, which typically provides us with account history, transaction activity and account balances.
- *Correspondence*, in any form, between the client and us.

We do not release information about clients or their accounts to any third party unless one of the following conditions are met:

- We receive the client’s prior consent directly or through the client’s representative.
- The recipient is a broker, custodian or other service provider with whom we must share information in order to manage the client’s account.
- We are required by law to release the information

We adhere to the policies and practices described in this policy whether a client is a current or former client of a financial advisor that has engaged our services. Our privacy policy may be revised in the future. If you would like a printed copy of this privacy policy, please contact us at 415-461-7788.