

**A Notice to Our Clients  
Regarding Our Privacy Policies and Procedures**

At Murphy Investment Management, we are committed to maintaining the confidentiality of your personal financial information. Federal law requires us to inform you of our policy and practices each year as long as we provide you services. From time to time, we may need to revise our privacy policy and practices. We will inform you of any such changes that may affect your rights.

Most of the information we collect about you comes directly from you, such as the information you provide on your account forms. Information may also come from other applications, agreements, or forms that you may provide to us in the transfer or setup of your account(s).

We do not sell or disclose information about our clients to any unaffiliated third parties. We provide information about current or former clients from the sources described above to parties outside of Murphy Investment Management, only as listed below:

- a) To other companies as necessary to process your business. For example, we transmit your account and transactional information to TD Ameritrade Institutional, Charles Schwab, and/or NWIA, the company/s that holds your account/s.
- b) Where required by law or regulation. Examples include responses to subpoena, court order or regulatory demand.
- c) As authorized by you. You may direct us, for example, to send your account statements and confirms to a third party.
- d) As otherwise required by law. For example, the law permits us to respond to a request for information about you from a consumer-reporting agency.

As we have described, we may share the information we have about you with our staff, and our holding companies in order to enhance our ability to provide services that will be of value to you. There may be times, however, when we may need to release your personal information. At those times, and before we disclose it, we will ask you to provide us with written approval that can be revoked at any time.