

# Wallington Asset Management, LLC

## Client Information Privacy Principles

To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our clients.

1. **Recognition of a Client's Expectation of Privacy:** At Wallington Asset Management, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. While information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client information is a priority for Wallington.
2. **Use, Collection, and Retention of Client Information:** Wallington Asset Management limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth.
3. **Maintenance of Accurate Information:** Wallington Asset Management recognizes that it must maintain accurate client records. Therefore, Wallington has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct or update information in a timely manner.
4. **Limiting Employee Access to Information:** At Wallington Asset Management, employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Wallington employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.
5. **Protection of Information via Established Security Procedures:** Wallington Asset Management recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, Wallington has established appropriate security standards and procedures to guard against any unauthorized access to client information.
6. **Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Wallington places strict limits on who receives specific information about client accounts and other personally identifiable data. Wallington may share information with such companies if they provide a product or service that may benefit our clients. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our clients.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our clients; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a client.

7. **Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
8. **Disclosure of Privacy Principles to Clients:** Wallington recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information may contact our Chief Compliance Officer at (317) 575-8670.

These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients. We reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice.