

Stock Management LLC



BEN HEEB • MBA

PRIVACY POLICY

This is an annual notice of our pledge as required by law. You may contact us to discuss any portion of this, but no action is required on your part. Ben Heeb & Associates does not share or sell Customer Information, therefore there is no need for you to tell us not to. Ben Heeb & Associates (BH&A) privacy policy applies to anyone who is a current or former client or who inquires or registers for any of our services.

Throughout the policy, we refer to information that personally identifies you or your accounts as "personal information."

1. We do not sell or share your personal information to anyone.
 2. We do not disclose personal information to third parties, unless one of the following limited exceptions applies.
 - We disclose personal information to the Brokerage Company which is the custodian of your account including account application information, and such other limited information requested by them and deemed appropriate by us. This is necessary to open your account. You should have already received their Privacy Statement from them.
 - We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities, resolve customer disputes, perform credit authentication checks, or to your tax preparer or attorney (limited to appropriate information). Outside of these exceptions, we will not share your personal information with third parties (including spouses, unless you have specifically asked us to do so).
 3. We do collect personal information in the normal course of business in order to administer your accounts and serve you better.
 - Website usage. We do not collect "cookies" or track your usage of our website or any other.
 - Transaction Information. Once your account is active, we receive, collect and maintain information about transactions in your account including balances, positions, history, name in an internal client list that reflects your activities.
 4. We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.
 - To alert you of services available to you (internet access, BH&A statement personalization, etc.) or news articles that we feel may be interesting to you.
 - BH&A is unaffiliated with any other company and handles all reporting internally. Should there be any future contracts or alliances, you will be notified promptly of the relationship in a timely manner.
 5. We protect the confidentiality and security of your personal information.
 - Companies or individuals that might be hired to provide support services would not be allowed to use your personal information for their own purposes and are obligated to maintain strict confidentiality. We would limit access to the information directly related to the specific service provided.
 - We restrict access to personal information to our employees and associates for business purposes only. All employees are trained and required to safeguard such information.
 - We maintain physical, electronic and procedural safeguards to guard your personal information. Separate receptacles are located in our office for any paper that has identifying information on it. These receptacles are periodically emptied and shredded.
 6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.
 - If you identify any inaccuracy in your personal information, or need to update or correct that information, please contact us so that we may promptly update our records.
 7. We will provide notice of changes in our information-sharing practices.
 - If, at any time in the future, it is necessary to disclose any of your personal information in a way that requires changes to this policy, we will give you advance notice and the opportunity to opt out.
- www.BenHeeb.com has the most up to date copy of this privacy policy. You are invited to visit that site to review the policy at your convenience.

If you have any questions or concerns regarding this policy or any other issue, please contact us.