



Gooch & Company LLC

W. Blake Gooch, CFA
President

Privacy Policy

Gooch & Company strives to maintain your confidence and trust in our firm, an essential aspect of which is our commitment to your confidentiality and the security of your personal information. We pledge our commitment to your privacy and do not disclose any personal information unless required by law or at your direction. We do not sell your personal information.

Personal Information That We Collect and Maintain:

In order to provide investment management services to you, we collect and maintain the following types of personal information:

- Information we receive from you in order to open your account (including your name, address, Social Security number, marital status, assets, and income);
- Information about your transactions with us, our affiliates, or others in order to service your account (such as account statements and trade tickets);
- Information that we receive from third parties with respect to your account (such as brokerage confirmations).

To Whom We Share Information About You:

In order for us to provide investment management services to you, we may disclose, in certain limited instances, personal information that we collect and maintain from you, which includes:

- Disclosures that are authorized or requested by you;
- Disclosures as required by law (such as those to cooperate with regulators or law enforcement authorities);
- Disclosures in connection with the processing of client transactions (such as with a broker-dealer or bank).

How We Protect Your Personal Information:

We maintain the confidentiality, security and integrity of your personal information by:

- Maintaining physical, electronic and procedural safeguards that exceed state and federal standards governing how personal information should be stored;
- Limiting access to those employees with a legitimate need for the information;
- Requiring third parties that perform services for us to agree by contract to keep your information strictly confidential;
- Maintaining the same standards of privacy for former clients as for our current clients.

How to Contact Us With Privacy Questions:

If you have any questions regarding our privacy policy, please contact us by phone at (617) 752-1869 or email at info@GoochCompany.com.