

Robert T. Napier & Associates, P.C.
200 South Wacker Drive, Suite 750, Chicago, Illinois 60606
(312) 756-1111, Fax (312) 756-9000

DISCLOSURE AND OPT OUT NOTICE
NOTICE OF THE FIRM'S PRIVACY POLICIES

I. Acquisition of Client Information

The firm collects nonpublic personal information about our clients from the following sources:

- **Information You Provide:** Our client engagements routinely require us to obtain private information about our clients so that we can proceed with the various services we perform for our clients as part of the business relationship.
- **Other Sources:** Depending upon the particular service a particular client has engaged the firm to complete, we may request nonpublic personal information concerning the matter at hand. However, this information is never obtained without our client's specific authorization of the type of information and the source(s) from which it may be obtained.

II. Disclosure of Nonpublic Personal Information

It is the policy of the firm to never disclose nonpublic personal information, or any other information, about our clients. Nonpublic personal information is defined in the regulations as: any publicly available information that we acquire by using information you have provided us in connection with any professional services we perform for you, which is not public information. An example would be a bank account number that is somehow used to acquire information regarding a court trial or other public record that would not have been found by us without using the bank account number acquired from you. In a generic sense, any information that a client provides us which involves a financial product or service is likely to be considered nonpublic personal information and receives the same protection from disclosure as any other information about our clients. For purposes of our business relationships with our clients, all information acquired is only disclosed under the following conditions:

- **Employees of the Firm:** Employees that need such information to conclude a transaction for which the client has engaged the firm.
- **Service Providers:** As with any business, we have our own accounting, insurance, and other service firms which we may need to provide information that the regulations consider nonpublic personal information. An example might be your account activity for our accounting firm to prepare billings and financial statements for our internal or external purposes. Another example would be computer consultants that must have access to certain client records so as to be able to increase the efficiency of our computer processing systems. We have always insisted that any such information that needed to be disclosed for a business purpose be considered confidential and not used for any purpose other than the specific business need. That well-understood business policy of confidentiality will be reinforced by a contractual agreement between such service providers to the firm referencing the FTC regulations.
- **Others:** Other than as stated above, we do not disclose nonpublic personal information, or any other information, to any outside party that the client has not specifically authorized to allow the firm to disclose the information. An example would be other professionals that are assisting the firm in carrying out a client engagement. In such a case, we would require that client's approval for such a disclosure.

In addition to the privacy protection that the new FTC regulations provide you, the Internal Revenue Code prevents the disclosure of client information provided for tax planning or preparation services, without the client's written permission. Further, most, if not all, professionals who are licensed by a state to practice, are precluded by the ethics rules that govern the operating principles that the professional must follow, from disclosing client information.

- **Security Arrangement:** We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard our clients' nonpublic personal information, or any other information, so as to ensure our clients that their privacy is a major part of the firm's commitment to provide the finest service possible.

III. Opt Out Provision

The Federal Trade Commission regulations provide that this notice must include a provision for you to request that the firm not release your nonpublic personal information. While such a request is unnecessary, because the firm does not disclose your nonpublic personal information in a manner that would allow you to opt out, in the interests of satisfying the regulations, we include this Opt Out Provision.