SA ADVISORY LLC

4595 BROADMOOR SE, SUITE 291
GRAND RAPIDS, MICHIGAN 49512
(616) 698-2249

PRIVACY POLICY

SA Advisory LLC is committed to safeguarding the confidential information of our clients because mutual trust is essential to the advisor-client relationship. Personal privacy is of the utmost importance to our clients. This is our policy describing how we treat your personal information. We welcome any comments or concerns you may have about your personal privacy.

INFORMATION WE COLLECT FROM YOU

We collect nonpublic personal information from you, our client, to assist us in giving you appropriate investment advice and in managing your investments. The categories of nonpublic information that we collect from each client depend upon the scope of the client engagement. We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, social security number, telephone number, assets, income, taxes, medical and health information to the extent that it is needed for the financial planning process, and insurance beneficiaries.

- Information about your transactions with us, our affiliates, custodians, or others, such as your account balance, investment cost, investment distributions, investment gain or loss, payment history, parties to transactions, account usage, and insurance policy coverage and premiums.

"Nonpublic personal information" is nonpublic information about you that we obtain in connection with providing a financial product or service to you for personal, family, or household purposes. It does not include information available from government records, widely distributed media, or government mandated disclosures.

THIRD PARTIES WITH WHOM WE MAY WE SHARE INFORMATION

We do not disclose nonpublic personal information about our clients or former clients to anyone except as otherwise permitted by law. For example, we are permitted by law to share information about you with:

- Our Investment Advisory Representatives, employees, and the person who may have referred you to our firm.

- Companies that assist us in processing your transactions and servicing your account, such as introducing and clearing brokerage firms, mutual fund companies, and insurance companies.

- An accountant, tax preparer, or lawyer who is representing you.

- Federal and state regulators who regulate our firm.

We do not provide your personally identifiable information to direct marketers or independent solicitors (for other companies) for any purpose.

DISCLOSURE OF INFORMATION ABOUT FORMER CUSTOMERS

If you decide to close your account(s), we will continue to adhere to the privacy practices described in this notice when you become a former client. You become a former client when your Investment Management Agreement with us is terminated.

We will maintain personally identifiable information about you during the time you are a client, and for any time thereafter that we are required to maintain the records by federal and state securities laws. After this required period of record retention, all of your information will be destroyed.

OUR SECURITY POLICIES AND PRACTICES

We take all reasonable steps to assure the privacy of client information. We restrict access to nonpublic personal information about you to those employees who have a business or professional reason for knowing, as permitted by law.

We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.