



## Privacy Policy & Practice

### Our Commitment to Privacy & Confidentiality

For the past twenty years, Wolverine Investments® has been providing investment advisory services to individual and institutional clients. As a Securities and Exchange Commission Registered Investment Adviser, and like most other providers of personal financial services, we are required by law to inform our clients of our policies and practices regarding privacy of client information. We have been and continue to be bound by professional standards of confidentiality that are even more stringent than those required by law. Protecting the confidentiality and security of personal information has always been of paramount importance to us.

### Types of Personal Information We Collect

Wolverine collects nonpublic personal information about our clients in order to provide investment management services, or to satisfy legal or regulatory requirements. We may collect information about clients from the following sources:

- Information provided by the client, including but not limited to information from agreements, applications, worksheets, questionnaires, or other written and electronic correspondence;
- Information obtained from the client directly during meetings and telephone conversations, or from parties authorized by the clients, such as accountants, attorneys or financial advisers;
- Information about a client's transactions with Wolverine or others, such as past or present account custodians or brokerage firms.

### Under What Circumstances Do We Disclose Information

**We do not disclose any nonpublic personal information about our clients (or former clients) to anyone except as required or permitted by law or as specifically requested by our clients.** For example, we may, as required by law, disclose personal information in response to a subpoena or to comply with an inquiry or requirement of a government agency or regulator. As permitted by law, without prior client authorization, we may also disclose the personal information we collect to nonaffiliated third party brokers or dealers and/or custodial firms to enable them to open and maintain an account and execute and process security and related transactions for the client. All clients should receive separate privacy policy notices from such firms. We presently do not share nonpublic personal information with any of the other categories of affiliated and nonaffiliated third parties permitted by law. **This means that, except in the those specific and limited situations, without a client's prior consent we will not make any disclosures of information to other companies or persons who might be interested in such information for any purpose.** For example, we do not sell or furnish client lists to anyone wanting to sell their products or services to our clients.

**Protective Policies and Procedures**

We restrict access to nonpublic personal information about clients to those employees and authorized agents of Wolverine Investments® who need to know that information to provide services to clients. Our employees and agents are required to protect the confidentiality of information and to comply with our established policies. Any violation of our Privacy Policy would make them subject to disciplinary process. We also maintain physical, electronic and procedural safeguards in compliance with applicable laws and regulations to guard a client's nonpublic personal information.