Northland Capital Management

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Disclosure Brochure

Form ADV Part 2A
March 21, 2023

This brochure provides information about the qualifications and business practices of Northland Capital Management LLC. If you have any questions about the contents of this brochure, please contact us at 218-741-5390. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Northland Capital Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

There have been no material changes to Northland Capital Management LLC's disclosure brochure since its last annual update on February 10, 2022.

Please read this disclosure brochure in its entirety, and feel free to contact us if you have any questions.

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Advisory Business

Northland Capital Management LLC is a fee-only investment advisory firm which has been in business since June 6, 2008. Northland Capital Management and its advisers serve as fiduciaries for their clients' investment advisory accounts under the Investment Advisers Act of 1940, as amended, and relevant court rulings. Christopher A. Erickson is the principal owner of the firm. Chris Erickson, Julie Johnson, and Andy Rogers serve as the firm's investment advisor representatives.

Northland Capital Management tailors investment advisory services to the individual needs of its clients by considering each client's investment objectives, financial circumstances, and stated risk tolerance. Our primary business is managing our clients' investment portfolios with discretionary trading authority. Discretionary trading authority means that we can buy or sell securities in our clients' accounts without receiving client approval for each transaction before it occurs.

Discretionary portfolio management -- model portfolios:
We offer various model portfolios ranging from "Conservative" to "All Equity" which are based on the principles of asset allocation and diversification. Each model portfolio has asset allocation ranges for equities, fixed income, cash, and alternative investments.

We diversify our model portfolios across and within various areas of the financial markets. Our portfolios typically invest in multiple asset classes, countries, and industries. We primarily use Exchange Traded Funds (ETFs) which trade when the stock market is open and mutual funds which trade at the end of the day. ETFs and mutual funds provide diversification as each ETF and mutual fund owns many securities. Our portfolios own both value-style and growth-style stocks; however, our portfolios' stock allocations have a "tilt" toward value stock investments. Our portfolios' fixed income investments typically are ETFs and mutual funds which invest in government bonds, mortgage-backed securities, and corporate bonds.

When we update our model portfolios, discretionary trading authority allows us to make corresponding purchases and sales of securities in clients' accounts to reflect changes in our models. We request that clients notify us of any changes in their financial situations or investment objectives, because we might recommend a different portfolio in light of new circumstances. At times we will tailor a client's portfolio to their unique circumstances. For example, we might retain certain securities in a client's portfolio for a longer time than for other clients due to their tax situation. Clients also can limit or restrict our ability to purchase certain securities or types of securities in their portfolios, but clients rarely do so.

We actively manage our clients' accounts ourselves i.e., we do not outsource the ongoing management of our clients' accounts to other investment managers.

As of February 2, 2023, we managed 517 accounts for 284 clients worth $155,398,970, all with discretionary trading authority.

Limitations on investment advice:
All accounts that we manage must follow our model portfolios. However, in a few client-specific situations we allow a client's discretionary-managed account to deviate from our model portfolios. Such situations could include when a client has imposed a restriction against purchasing a certain security, when an account holds a small "legacy" investment in addition to the securities in our model portfolios, when an account is in the process of being placed under our management or leaving our management, etc. Our model portfolios only invest in publicly traded securities which are held in brokerage accounts. Our model portfolios do not invest in, nor do we provide advice about, privately traded securities or cryptocurrencies.

Authorized agent accounts:
As a courtesy, and at our sole discretion, we assist some clients as an "authorized agent" (but not as an "investment advisor") for brokerage accounts in which they want to self-direct their investments. In these situations, clients grant us limited trading authorization for their brokerage account. As an authorized agent, we enter only those orders given to us by clients, and the account owner is in complete control of the investments in these accounts. While we do not make investment recommendations for these accounts, we do help with administrative tasks such as requesting funds from the account's custodian. *Because we do not provide any continuous or regular supervisory or management services on accounts for which we serve only as an authorized agent, we are not responsible for typical investment advisory functions such as appropriateness of investments, diversification, performance reporting, etc. for these accounts.* We receive no compensation when serving in this capacity, and these accounts are specifically excluded from investment advisory services, supervision, and management in our Investment Management Agreements.

As of February 2, 2023, we served as an authorized agent for 44 accounts worth $28,194,105. As we do not manage these assets, they are excluded from the managed account and asset totals on the previous page.

Financial planning for discretionary portfolio management clients:
If a discretionary portfolio management client requests financial planning services, we will provide limited financial planning services for no additional charge. Our financial planning activities typically consist of financial projections for clients who are accumulating wealth for retirement, as well as for retired clients who rely on investment income to support their lifestyle. However, if a discretionary portfolio management client requests extraordinary financial planning services (typically involving detailed household budgeting decisions, but to be determined at our sole discretion), we reserve the right to charge for additional services for an hourly fee. We do not provide advice about estate planning and asset preservation strategies, as we recommend clients consult with attorneys who specialize in these areas.

Ad-hoc investment advisory and financial planning services:
We occasionally provide ad-hoc, limited investment advisory services and limited financial planning services to individuals whose investment accounts are not managed by our firm. We charge an hourly fee in these situations. Clients are free to implement our investment advice or financial planning recommendations with other firms.

Fees and Compensation

Northland Capital Management is a fee-only investment advisory firm. Our primary source of income is a discretionary portfolio management fee.

Our discretionary portfolio management fee is 1.00% per year (0.25% per quarter) which is based on the value of our clients' discretionary-managed accounts including cash and cash equivalents. We consider cash to be a distinct asset class and these funds are included in our fee calculation. During some market environments interest rates on cash are less than our management fee and clients will experience a negative return on that portion of their account. In the event a client requests us to hold a substantial percentage of their assets in cash for an extended period, we recommend cash be held in a separate account that will not incur our management fee. Our fee rate is not negotiable; however, in certain situations we provide discretionary investment management services as a courtesy for no cost.

Our management fee does not include costs that other parties charge such as brokerage account fees, commissions, and expenses inside ETFs and mutual funds. We do not receive any portion of these costs. Additional brokerage information is provided in the Brokerage Practices section of this document.

Our management fee is charged quarterly in advance. During the first month of each quarter we instruct the independent account custodian of our clients' accounts to deduct our management fees for the current quarter from our clients' accounts and remit them to us. To calculate our fees, we multiply each managed account's value on the last day of the previous quarter by the account's annual fee percentage and divide by four. If a client deposits or withdraws assets from their account, we do not adjust the fee for the current quarter. Clients can terminate our services at any time by notifying us in writing. If a client terminates our services, we typically pro-rate and refund our management fee based on the number of days remaining in the quarter. However, if services are terminated for a client's discretionary-managed account, and if its assets are transferred to another discretionary-managed account for the same client for our continued management, we do not refund the prepaid fee for the account whose services are terminated.

In order to reduce potential conflicts of interest, neither our firm nor our personnel receive compensation from any other financial industry sources or services. However, because our discretionary portfolio management fees are determined by the values of the accounts we manage, we have a conflict of interest if we recommend you hire us to manage your investment assets because we will receive fees for subsequent portfolio management services.

An example of a conflict of interest is if we were to recommend you roll over your retirement plan assets or transfer your IRA assets into an IRA for us to manage. In these situations, when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interest, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We have a similar conflict of interest when discussing whether clients should withdraw assets that we manage for other uses such as reducing debt or donating to charity.

As mentioned previously, for individuals whose investment are not managed by our firm, we charge an hourly fee for ad-hoc services (i.e., limited investment advisory services and limited financial planning services). For discretionary portfolio management clients, we also charge an hourly fee for extraordinary (to be determined at our sole discretion) financial planning services. Our fee for these services is $100 per hour.

Performance-Based *Fees and Side-by-Side Management*

We do not charge performance-based fees. In a performance-based fee arrangement, an advisor typically charges a fee based on a share of a client's capital gains or capital appreciation, instead of or in addition to a fee based on the value of their account. Our portfolio management fees are based solely on account value.

Types *of Clients*

Our clients are primarily individuals, trusts, and pension plans. We do not have a set minimum account or relationship size, as this is determined on a case-by-case basis.

Methods *of Analysis, Investment Strategies, and Risk of Loss*

Discretionary-managed accounts:

We construct investment portfolios by diversifying across and within many areas of the financial markets. Our discretionary-managed portfolios invest in multiple asset classes, countries, and industries. We generally manage our discretionary portfolios with a "top-down" process. Top-down managers create portfolios by investing in broad segments of the financial markets which they believe offer attractive investment potential, as opposed to "bottom-up" managers who typically create portfolios by selecting individual company stocks and bonds. As mentioned before, our portfolios own both value-style and growth-style stocks; however, our portfolios' overall stock allocations have a "tilt" toward value stock investments. We offer two types of model portfolios: standard model portfolios and ESG model portfolios.

Standard model portfolios:

Our standard model portfolios' primary stock investments typically include ETFs and mutual funds which implement various "factor" or "smart-beta" investment strategies. Factor-based strategies place additional emphasis on stocks with certain characteristics, such as the "value" and "small cap" factors. Value strategies typically own investments that are undervalued relative to historical averages, anticipating the investments could return to levels that are closer to historical norms. The primary smart-beta investment strategy in our standard portfolios is a "fundamentally-weighted" strategy which allocates money to stocks based on a company's fundamentals (sales, cash flow, etc.) instead of a company's market value. Our standard model portfolios own large, mid, and small-cap companies. When combining the various strategies described above, our standard portfolios have a "tilt" toward value-style stock investments.

Our standard model portfolios' primary fixed income investments typically include ETFs and mutual funds which invest primarily in government bonds, mortgage-backed securities, and corporate bonds.

Our standard model portfolios typically have a small amount of cash and no alternative investments. However, we can purchase alternative investments if we decide to do so.

ESG model portfolios:

Our ESG model portfolios typically own corporate stock and bond ETFs and mutual funds which invest based on various ESG criteria. Our ESG model portfolios' government bond and mortgage-backed securities ETFs and mutual funds do not employ ESG criteria. Like our standard model portfolios, our ESG portfolios typically have a small amount of cash and no alternative investments, but we can purchase alternative investments if we decide to do so.

The primary objective of our ESG portfolios is to invest in a diversified portfolio of companies which in total have lower carbon emissions per dollar of sales than the broad stock and corporate bond markets. MSCI publishes "carbon intensity" data for various investments and we use this data to estimate the total carbon footprint of the companies in our ESG portfolios. Our ESG portfolios also have a lesser investment in companies with controversial businesses such as tobacco, but that is secondary to our primary objective of investing in companies with smaller carbon footprints. We do not maintain our own proprietary ESG ratings or scores; rather, we use ETFs and mutual funds that seek to track ESG indexes developed by large index providers such as MSCI. Our efforts to "fine-tune" our ESG portfolios are limited by the ESG methodologies of major index providers and the availability of investments which seek to track them.

Because our ESG portfolios forego some investment strategies available to our standard portfolios, and because our ESG portfolios select or avoid investments based on ESG criteria, at times our ESG portfolios will underperform our standard portfolios. There are many definitions and implementations of ESG in the investment profession, and we would be pleased to provide more detailed information upon request.

All portfolios:

When managing our standard and ESG portfolios, we realize that markets are cyclical, so we prefer to buy after prices have declined or during periods of poor relative performance when we believe there is a greater margin of safety. We strive to be "fearful when others are greedy and greedy when others are fearful." We usually hold investments for many months to a few years. However, if an opportunity presents itself, we are not opposed to taking a quick profit or trading part of a portfolio more actively depending on market conditions.

Risks:
Our discretionary-managed accounts are diversified across multiple investments, and the values of these accounts typically fluctuate in a manner consistent with their asset allocation, degree of factor tilt, degree of smart-beta implementation, and prevailing market conditions. Some significant material risks of our investment platform include:

- Investment strategy risk – Our standard portfolios typically own ETFs designed to implement various factor-based and smart-beta investment strategies, whereas our ESG portfolios invest based on environmental and other criteria. Sometimes these investment strategies perform better than popular stock market indexes and sometimes they perform worse. It is possible that these strategies could lose money in an up year for stock markets overall, and vice versa.

- Manager risk – Our clients (particularly clients with discretionary-managed accounts) assume "manager risk" or "selection risk." The profitability of our portfolios is partly determined by our ability to predict future prices of investments and the quality of our decision making. Although we are generally pleased with our discretionary portfolios' past performance, we cannot make any assurances about how they will perform in the future. Clients who wish to reduce manager risk should place some of their assets with another investment advisor.

- Key person risk – Our firm maintains a Business Continuity Plan designed to mitigate a variety of risks, including the potential of Chris Erickson's inability to fulfill his duties. If this situation were to occur, management of the firm would transition to Julie Johnson.

- Custodial risk – We recommend and request that any brokerage accounts we manage be held by National Financial Services LLC (NFS), a subsidiary of Fidelity. Industry regulations require that our clients' brokerage accounts be segregated from Fidelity's corporate accounts. NFS accounts have additional protection through the Securities Investor Protection Corporation (SIPC), as well as "excess SIPC" insurance to potentially cover certain amounts over SIPC limits. However, it is possible that NFS could fail and depending on the circumstances at the time, our clients could experience losses greater than what NFS, Fidelity, the SIPC, and excess SIPC insurance are able or willing to bear. Clients who wish to reduce custodial risk should place some of their investment assets with another custodian.

- Counterparty risk – Counterparty risk is the risk that another party or financial institution will not honor its obligations. One way to reduce counterparty risk is to diversify one's assets across various participants in the financial industry (brokerage firms, banks, insurance companies, etc.) Another way to reduce counterparty risk is to own tangible assets outside of the financial system such as real estate, gold, currency, fine art, etc.

- Systemic risk – The global financial system runs on debt. Many large financial institutions which are critical to the financial system depend on the continuous availability of debt to finance their operations. These institutions often are highly leveraged (i.e., they have much more debt than equity) which increases the instability of the financial system. A leveraged financial system, dependent on debt, is susceptible to periodic crises and occasionally requires intervention from a willing government to support it. A successful investment in a portfolio of stocks and bonds depends on a functional financial system and infrastructure. *All portfolios including traditionally conservative portfolios can experience significant temporary or permanent losses during a period of* *financial system instability.* Some events that could put the financial system at risk include a failure of the Depository Trust and Clearing Corporation which settles over a quadrillion dollars of securities transactions annually, a default in the derivatives market, a disorderly default (or the fear of a default) of a systemically-important country or financial institution, problems in the securities lending process, an inability or unwillingness of major market participants to perform normal business functions, cyber-attacks, communications network failures, power grid failures, pandemics, etc. In addition to experiencing a potential significant decline in account value, clients might not be able to access their funds during these circumstances.

Investing in securities also involves risks inherent to each particular security. Some significant material risks of the securities in which we invest include:

- Equities – The prices of equity securities are affected by changes in a company's expected profitability, economic conditions, market conditions, geopolitical events, investor psychology, interest rates, etc.

- Fixed income – The prices of fixed income securities are affected by changes in interest rates, risk of default, economic conditions, market conditions, investor psychology, etc.

- Exchange Traded Funds (ETFs) – ETFs that invest in equities or fixed income securities possess the same risks as their underlying equity or fixed income investments described above. Although ETFs trade on various stock exchanges, trading can be interrupted or suspended for a variety of reasons. ETFs also can trade at prices above or below the fair market value of the investments owned by the ETF. Clients receive prospectuses for ETFs which discuss their risks in greater detail.

- Mutual funds – Mutual funds that invest in equities or fixed income securities possess the same risks as their underlying equity or fixed income investments described above. During extreme market conditions, mutual funds can trade at prices above or below the fair market value of the investments owned by the mutual fund. Most mutual funds only can be purchased or sold at the end of the trading day. Clients receive prospectuses for mutual funds which discuss their risks in greater detail.

- Foreign investments – Some securities invest in foreign companies or governments. These securities involve additional risks such as nationalization, currency exchange rate fluctuations, and differing accounting standards.

Although we have attempted to identify the primary risks of investing with us, it is not possible to list every conceivable risk of our investment strategies and of the securities in which we invest. Investing in securities involves risk of loss that clients should be prepared to bear.

Disciplinary *Information*

We are required to disclose if there are legal or disciplinary events that are material to a current or prospective client's evaluation of our advisory business or the integrity of our management. We have no legal or disciplinary events to disclose.

Other *Financial Industry Activities and Affiliations*

Discretionary portfolio management fees and hourly consulting fees are Northland Capital Management's sole source of income. In turn, Northland Capital Management is Chris Erickson's, Julie Johnson's, and Andy Rogers' sole source of compensation. Northland Capital Management, Chris Erickson, Julie Johnson, and Andy Rogers do not receive compensation from any other financial industry activities or affiliations. We do not receive brokerage commissions, we do not sell insurance or insurance-based investments, nor do we offer any proprietary products.

Code *of Ethics, Participation or Interest in Client Transactions, and Personal Trading*

As a fee-only investment advisor, Northland Capital Management is held to a fiduciary standard. One way we endeavor to fulfill our fiduciary duty is through our Code of Ethics. Our Code of Ethics requires that we place our clients' interests first, not take inappropriate advantage of our position, monitor our employees' personal investments and trading, prohibit insider trading, maintain a high standard of business conduct, comply with securities laws, require pre-approval for giving and receiving gifts over $250, etc. We would be pleased to provide a copy of our Code of Ethics to current or prospective clients upon request.

We typically buy or sell for ourselves the same investments that we recommend to our clients; however, we typically do not buy or sell the same investment for ourselves earlier in the day before we buy or sell for our clients. Under a discretionary trading agreement, our firm's personnel typically participate concurrently with our clients in aggregated block trades if the supply of the security being purchased is not limited and if we believe our participation would not adversely impact the price our clients would receive. If supply is limited, our firm's supervised persons do not receive any allocation of the security being purchased until all clients have received their entire allocations.

Brokerage *Practices*

We recommend and request that our clients use NFS, a subsidiary of Fidelity, as custodian for any accounts we manage, and all of our clients have complied with this request.

We have discretionary authority to select a broker or dealer to purchase or sell securities for our clients; however, for many years we have used Fidelity exclusively to execute our clients' securities transactions. Fidelity provides access to a wide variety of investments, competitive pricing, and quality execution of large securities orders. Although we believe Fidelity provides our clients with the best overall value, Fidelity's commissions, trading spreads, and fees could be higher or lower than those of its competitors on any given transaction. If we were to conclude that Fidelity no longer provides our clients with the best overall value, or if we felt that a certain transaction would be better executed by another brokerage firm, we are free to execute our clients' securities transactions elsewhere. Fidelity is family-owned, employee-owned, and one of the largest investment firms in the U.S.

Research and other soft dollar benefits:
We do not receive "soft dollar" benefits from any brokerage firms. However, in our industry, it is common for brokerage firms such as Fidelity to provide firms our size with services to help us manage our clients' accounts. At no cost to us, Fidelity provides us with:

- a secure website to view our clients' account information, calculate the size of potential orders, and transmit orders for execution;
- access to a dedicated trading desk for large securities orders;
- the ability to allocate aggregated trade orders across multiple client accounts;
- a service team to call with account-related questions;
- the ability to deduct management fees from clients' accounts and remit them to our firm; and
- financial market commentaries via newsletters and conference calls.

Our receipt of these account management services at no cost from Fidelity creates a conflict of interest. Nevertheless, the fact that Fidelity offers these services at no cost has no bearing on our recommendation of Fidelity for our clients' managed accounts, as most of Fidelity's competitors offer these same services to firms such as ours at no cost.

Brokerage for client referrals:
We do not accept client referrals from Fidelity, mutual fund companies, or ETF issuers. This is to eliminate a potential conflict of interest. If we were to accept referrals from Fidelity, our clients might believe that we recommend Fidelity because it is best for our business instead of best for our clients. Similarly, if we were to accept referrals from mutual fund companies or ETF issuers, our clients might believe that we select investments that favor our business over our clients.

Directed Brokerage:
We do not allow our clients to choose which brokerage firm executes their securities transactions.

Order Aggregation:
When we decide to buy or sell an investment for multiple clients, especially when making changes to our model portfolios, we typically aggregate all of our clients' orders into one order and allocate the order pro-rata across our clients' accounts based on each account's value. However, if we believe a client will be depositing/withdrawing funds to/from their account in the near future, we may consider the anticipated deposit/withdrawal in our calculations to reduce the number of securities transactions the client might otherwise incur. All clients who participate in an aggregated order receive the same price, so no client receives a better price than another. Exceptions to our order aggregation practice do occur, such as when a client calls us to request funds and we need to sell securities to satisfy their withdrawal after we already have placed an aggregated order for the same security earlier in the day, when we are rebalancing a small number of accounts, when a client has a unique issue that causes their portfolio to deviate from our model portfolios, etc.

Review of Accounts

We review the investments in, and the performance of, all of our clients' discretionary-managed accounts. We also examine these accounts for deviations from our model portfolios and make adjustments as we deem appropriate. Andy Rogers, Investment Advisor Representative, and Chris Erickson, President of Northland Capital Management, conduct these reviews. We typically conduct reviews on a monthly basis.

Staying connected to our clients is a priority, and every three months we send our clients a letter to report the performance of their discretionary-managed accounts. We also contact each of our discretionary portfolio management clients at least annually to review their portfolio in light of potential changes to their financial situation or investment objectives. Clients should contact us immediately if there are any changes to their financial circumstances or investment objectives.

We do not review self-directed accounts for which we serve as an authorized agent and are not responsible for the investment strategy. In addition, when we provide ad-hoc investment advice to individuals who are not discretionary portfolio management clients, we do not review their investments again unless in the future they contact us for another consultation.

Client Referrals and Other Compensation

While we welcome referrals of potential clients to our firm, we do not accept referrals from vendors such as independent custodians or brokerage firms. This is to ensure that our vendor selections, which ultimately affect our clients, are not influenced by potential referral activities. Our decisions and recommendations are based on what we believe is best for our clients, not what might be best for our business. We do not compensate anyone for referrals. Finally, we do not receive any payments for referring our clients to other professionals such as insurance agents, accountants, attorneys, etc.

Custody

We do not maintain physical custody of client funds or securities. Client funds and securities are held by NFS, an independent qualified custodian and a subsidiary of Fidelity. However, we are deemed to have limited custody of client funds and securities because clients sign Investment Management Agreements which, based on our instructions, allow Fidelity to deduct our management fees from our clients' accounts and remit the fees to us.

Fidelity provides our clients with monthly account statements. We urge you to carefully review Fidelity's account statements and compare them with any information you receive from us. If you believe there are any discrepancies, or if you do not receive your Fidelity account statements on a timely basis, please contact us immediately.

Investment Discretion

When clients hire us to provide portfolio management services, clients must sign our Discretionary Investment Management Agreement which includes a limited power of attorney before we can accept discretionary trading authority. Each client's Investment Management Agreement provides asset allocation ranges that guide us in our ongoing management. Clients also can limit our ability to purchase certain securities or types of securities.

Voting Client Securities

Our clients occasionally receive proxies or solicitations from their account's custodian or transfer agents. Proxies allow clients to vote on matters regarding their investments. Please feel free to call us if you have questions about any proxies you receive. We do not vote proxies for our clients.

Financial Information

Northland Capital Management does not have any debt. We do not have any financial obligations that would impair our ability to meet our contractual commitments to our clients.

Privacy Policy Notice

Our Privacy Policy applies to Northland Capital Management's current and former clients. This version of our Privacy Policy became effective on March 16, 2021.

Two terms that often appear in this document are "nonpublic personal information" and "nonaffiliated third parties." Nonpublic personal information ("NPI") includes personally identifiable financial information about you and certain other information that is not publicly available. A nonaffiliated third party means any other company or anyone who is not an employee of Northland Capital Management.

We restrict access to NPI about you to our employees and nonaffiliated third parties as permitted by law. Our employees must abide by our security practices and procedures which are designed to ensure the confidentiality of your NPI. In addition, we maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your NPI.

We collect various types of NPI including social security numbers, account numbers, birthdates, income, net worth, account balances, addresses, e-mail addresses, phone numbers, income sources and needs, portfolio risk, etc. We typically collect this information from you when you enter into an investment advisory agreement and in subsequent transactions and discussions with us. We also collect NPI from nonaffiliated third parties such as Fidelity. This NPI includes account balances, transaction reports, tax information, etc.

All financial companies need to share some personal information to run their everyday business. For our everyday business purposes, we share your NPI with certain nonaffiliated third parties as permitted by law. For example, we share most of the types of NPI described in the previous paragraph with Fidelity, as Fidelity processes your transactions and maintains your brokerage account.

We also share some of the above types of NPI with nonaffiliated third parties such as service providers. These companies provide services such as CRM functions, archiving of electronic communications, etc. They are contractually bound to maintain the confidentiality of your NPI and to use the information solely for the purposes for which the information is disclosed or as otherwise permitted by law.

In addition, if required to do so, we will share your NPI for certain legal or regulatory purposes, such as to respond to court orders and legal investigations.

Except for the situations described above, we do not share your NPI without your permission for any other reason.

We value the trust and confidence you have placed in us. If you have any questions about our Privacy Policy, or any aspect of service we provide, please feel free to call us at 218-741-5390.