

PRIVACY POLICY

February 3, 2004	Approved by the Board of Directors	R2009-02
Describes the collection, handling and disclosure of client's private information.		

PURPOSE

Edmund & Wheeler, Inc. (EWI) values the trust of its clients and is committed to the responsible management, use and protection of personal information. Pursuant to USC § 6801, et seq. (Consumer Privacy), we adhere to the principles contained therein regarding the collection and disclosure of personal information.

OVERALL POLICY

Personal information, as used in this policy, means information that identifies an individual personally and is not otherwise publicly available information. It includes personal information such as financial assets, bank account information and financial debts. It also includes the social security number and other information of our client provided to us in response to our client confidential information checklist to create an Exchange Agreement.

Information We Collect

EWI collects personal information to support our documentation in providing Section 1031 Exchange Agreements.

- Information that we receive from client checklists or other forms.
- Information about transactions with us, our affiliates or others.

Information We Disclose

EWI discloses information pursuant to the USA Patriot Act to establish escrow accounts in the client name(s).

To Whom Do We Disclose

EWI provides personal information to banks in order to facilitate the opening of individual escrow accounts for our clients. We share client information to assist in the facilitation of exchanges with attorneys, title companies, settlement agents, brokers, and/or others directly involved in the transaction. We do not share non-public information with affiliates and nonaffiliated third parties, except as permitted by law and as provided for herein. Prior to sharing personal information with other unaffiliated third parties, except as described in this policy, we will give clients an opportunity to direct that such information not be disclosed.

Confidentiality and Security

We restrict access to personal information about clients to those of our employees who need to know that information to provide services to clients and to help them do their jobs. We maintain physical security procedures to safeguard the confidentiality and integrity of personal information in our possession and to guard against unauthorized access.