

FACTS**WHAT DOES McClain Value Management, LLC.
DO WITH YOUR PERSONAL INFORMATION?**

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number and Name ■ Account number and Account balances ■ Transaction history and Account holdings <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons McClain Value Management chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does McClain Value share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	NA	No Affiliates
For our affiliates' everyday business purposes— information about your creditworthiness	NA	No Affiliates
For nonaffiliates to market to you	No	We don't share

Questions?	Call 203-966-3197 or go to our website at: www.mcclainvalue.com
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Who we are

Who is providing this notice?

McClain Value Management, LLC.

What we do

How does McClain Value Management protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We conduct periodic reviews of our computer systems, security features and we educate all employees to safeguard client information.

How does McClain Value Management collect my personal information?

We collect your personal information, for example, when you

- Open an account(s) or Close an account(s)
- Deposits or Withdrawals from your account
- Enter into an investment advisory contract

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See the "Other important information section below.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *McClain Value Management does not have affiliates.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *McClain Value Management does not share with nonaffiliates for marketing purposes. We share with brokers, banks and custodians for everyday business needs.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *McClain Value Management doesn't engage in joint marketing.*

Other important information

If, at any time, McClain Value Management, LLC adopts material changes to its privacy policies, the firm shall provide each client with a revised notice reflecting the new privacy policies.