

FACTS

WHAT DOES BARTON INVESTMENT MANAGEMENT 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Account balances
- Transaction history

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share client information to run their everyday business. In the section below, we list the reasons financial companies can share their client’s personal information; the reasons Barton chooses to share; and whether you can limit this sharing.

Reasons that we can share your personal information	Does Barton 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 do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates’ everyday business purposes— information about your transactions and experiences	No	We do not share
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We do not share
For non-affiliates to market to you	No	We do not share

Who we are

Who is providing this notice?

Barton Investment Management

What we do

How does Barton Investment 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.

With regard to our internal security procedures, we restrict access to your personal and account information to those employees and FAs who need to know. We maintain physical, electronic and procedural safeguards designed to protect your nonpublic personal information – including training and confidentiality agreements with companies that help provide our services to you.

How does Barton Investment Management collect my personal information?

We collect your personal information, for example, when you

- Open an account or deposit money
- Seek advice about your investments
- Provide employment information

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 non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. We collect this data to continually offer you the products and services you need to help meet your investment objectives and to effect, administer or enforce transactions you authorize. We do not sell your information to anyone.

How does Barton Investment handle your Personal Information:

To better serve you, we may disclose your information to:

- Our independent contractor Baldwin Asset Management, for the purpose of executing transactions for clients who use Schwab as a custodian.
- Mutual fund companies, third-party administrators, broker/dealers, investment advisors and other such entities that provide services to you on our behalf.
- Companies that perform administrative or marketing services on our behalf, such as transfer agents or printers. These companies will use this data only for the services for which we hired them and are not permitted to share or use this information for any other purpose.
- Non-Affiliates that have been organized to assist in the conduct of our business, and as otherwise permitted by law.

Definitions

Affiliates

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

- **Barton has no affiliates.**

Non-affiliates

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

- **Barton does not share information with non-affiliates so they can market to you. Barton does share information with Baldwin Investment Management to execute transactions.**

Joint marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- **Barton does not jointly market with non-affiliated companies.**

Other important information

Questions?

Please call 610-226-4040 or go to www.bartonim.com