



**Gaia Capital Management, Inc.**  
Registered Investment Advisor

**James C. Pursley**  
**Vivian J. Lopez**  
Investment Advisor Representatives

# Privacy Policy

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The following policy applies to consumers who are former, prospective and current clients. Throughout this policy, we refer to any information that personally identifies you or your accounts as "personal information."

## **Protecting Your Privacy and Security**

Current regulations now require that we communicate to all of our clients what our policy is on protecting your privacy and security. We collect personal information from you to evaluate your needs, open your account(s), to process transactions and to help us provide a better level of service.

*We do not sell your personal information to anyone. We protect the security and confidentiality of the personal information we collect.*

## **Types and Uses of Personal Information**

During normal business practices, we collect personal information to open your account(s), to process your transactions and to help us provide excellent service for you.

When you open an account with us, we collect information such as name, address, phone numbers, social security number, date of birth, and information about your income, interests, and investments. We may also collect this information while determining whether or not we can assist you as a client of ours.

Once you have an account with us, we collect and maintain personal information about your transactions, including balances, positions, and history, and may include your name or other data in an internal client list that reflects your activities with our firm.

## **Personal Information Practices**

We do not sell your personal information to anyone and we protect the confidentiality and security of the personal information we collect. We restrict access to personal information to our employees and agents for business purposes only and safeguard the information you have entrusted to us. We protect your personal information through physical, electronic and procedural safeguards that we maintain.

We do not disclose personal information to third parties, unless you have specifically authorized us to do so, and except for the following reasons:

1. We disclose personal information to those companies that help us process or service your transactions or account(s), including trust companies and brokerage firms.
2. We may disclose personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to oblige regulators or law enforcement authorities.

## **Continuous Evaluation**

We continue to evaluate our efforts to protect your personal information and make every effort to keep it accurate and up to date. If you find any inaccuracies or need to make a change to that information, please contact us so that we may update our records.

We will give you advance notice of any changes we make in our information-sharing practices, so that you will have adequate opportunity to opt out of any disclosure.