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| FACTS | WHAT DOES STRATEGIC NAVIGATORS ASSET MANAGEMENT, LLC DO WITH YOUR PERSONAL INFORMATION? |
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| 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. |
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| What? | <p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> Tax Identification Number, Date of Birth, Telephone Number and Address Annual Income, Tax Bracket, Account Balances and Transaction History Net Worth, Assets and Employment History <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice</p> |
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| How? | All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons companies can share their clients’ personal information; the reasons Strategic Navigators Asset Management, LLC chooses to share; and whether you can limit this sharing. |
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| Reasons we can share your personal information? | Does Strategic Navigators Asset Management, LLC Share? | Can you limit this sharing? |
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| 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 | Yes | No |
| For Joint Marketing with other financial companies | No | We don’t share. |
| For our affiliates’ everyday business purposes - Information about your transactions and experiences | Yes | No |
| For our affiliates’ everyday business purposes- Information about your creditworthiness | No | We don’t share. |
| For non-affiliates to market to you | No | We don’t share |

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| Questions? | Call: (616) 369-7774 |
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| Who we are | |
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| Who is providing this notice? | Strategic Navigators Asset Management, LLC |

| What we do | |
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| How does Strategic Navigators Asset Management, LLC 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. |
| How does Strategic Navigators Asset Management, LLC collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Provide your personal information • Seek Investment Advice • Complete an Application <p>We also collect your personal information from other, such as credit bureaus, affiliates, or other companies.</p> |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • 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 <p>State laws and individual companies may give you additional rights to limit sharing.</p> |

| Definitions | |
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| Affiliates | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Strategic Navigators Asset Management, LLC does not share with affiliates so they can market to you.</i> |
| Non-affiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Strategic Navigators Asset Management, LLC does not share with non-affiliates so they can market to you.</i> |
| Joint Marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Strategic Navigators Asset Management, LLC does not jointly market.</i> |

| Other important information | |
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