



PRIVACY NOTICE

HOW WE USE YOUR PERSONAL INFORMATION

Since its founding in 1969, the firm of Mitchell Sinkler & Starr (MS&S) has maintained the privacy of its clients' personal and financial information as a matter of policy, and value the trust you place in us when you share your personal information. Please read this notice carefully to understand what we do.

We want to let you know how we deal with the personal information you give to us or we obtain from third parties. The purpose of this notice is to explain to you what kind of information we collect on you, the *data subject*, and why and how we process it as the *data controller*. This Notice describes your rights regarding the EU GDPR (General Data Protection Regulation) regulation, implemented on May 25, 2018.

1. To whose personal information does this Notice apply?

This Notice describes our practices when using:

- a. The personal information of individuals based in the European Economic Area (EEA)
- b. The personal information of persons based in the EEA who may visit our Website or Client Portal

2. What personal information are we collecting and why?

Data Protection laws say that we can use personal information, including sharing personal information with third parties, where we have proper reason to do so. We must have one of the following reasons for sharing:

- To fulfill a contract we have with you;
- To fulfill a legal or regulatory obligation;
- When you consent to it.

We may collect the following types of personal information from you or third parties:

- Identification data such as name, date of birth, home and work address, home and work email
- Profession, position and job title
- Photographs
- Government issued ID
- Tax identification number



- Nationality
- Personal bank account information
- Financial information such as transactions and fees paid
- Communications including letters, phone calls and emails

3. What are your rights?

Individuals have the following rights, under certain circumstances, regarding their personal information:

- Right to access personal information – individuals have the right to confirm with us whether we process personal information about them and the right to access the information and request a copy
- Right to rectify personal information – individuals have the right to request that we amend any incorrect personal information
- Right to restrict the use of personal information -- individuals have the right to request that we restrict processing of their personal information when an individual is contesting the accuracy, the process is unlawful, or we no longer require the information for processing
- Right to request that personal information is erased or destroyed – individuals can request the erasure of personal information if the personal information is no longer necessary or consent has been withdrawn and there is no other legal basis for processing
- Right to object to processing of personal information – an individual can object to the use of personal information for marketing or where the legal basis of the processing is in our legitimate interest. We will stop processing until we can determine if we have compelling legal grounds for processing that override the individual's rights, freedoms and interests
- Right to data portability (in specific circumstances) – where we are relying of the legal basis of either consent or that the processing is necessary for performance of the contract with the individual, and the personal information is processed by electronic means, an individual has the right to receive all of the personal information that they provided to us in a structured, commonly-used and machine-readable format
- Right to lodge a complaint with a supervisory authority – an individual has the right to lodge a complaint with a supervisory authority in the Member State in the European Union where they are residing, where they work, or where an alleged infringement of Data Protection laws has taken place

If you, as an individual, wish to exercise these rights, you can email your portfolio manager or complete an *Individual Rights Request Form*, a copy of which is attached.



If we receive a request to exercise one of these rights, we will inform you of the action we take on the request as soon as possible, but no later than one month from receipt of the request. If the request is complicated and requires more time, we will extend the timeframe for up to two additional months and will keep you updated on the status of your request.

The information will be provided free of charge unless the requests are excessive, unfounded or repetitive in nature. Under these circumstances we may refuse to act on the request or charge a fee. We will advise you of any potential fees prior to processing the request.

When we do not process your request, we will provide you with our reasons for not acting within one month of receipt of the request.

4. Marketing Communications

Any third parties that we use to assist us in marketing our products or services are under contractual agreement to protect the confidentiality of your personal information, and to use it only to provide the services we have instructed them to perform.

5. International Transfers & Data Sharing

We may transfer and maintain your personal information covered by this Notice on servers or databases outside the EEA. If we need to transfer personal data outside the EEA, we will take steps to ensure your personal information is protected and safeguarded.

In addition to sharing your personal information with third parties, we may disclose or transfer your information to a prospective or actual purchaser or transferee if Mitchell Sinkler & Starr is sold or merged to/with another company.

6. Retention Periods

We will retain your personal information covered by this Notice for as long as required to perform the purposes for which the data was collected. Personal information will be kept for the duration of our relationship and:

- The period required by tax, company and financial services regulations; and
- As long as necessary for individuals to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims

In general, we retain your personal information for six years after the end of the relationship. In certain situations, data may be retained for a longer period.



7. Confidentiality and Security

To protect your personal information from unauthorized access and use, we use security measures designed to secure personal information from accidental loss or unauthorized access. These measures include secured files and buildings, computer safeguards, physical destruction of records and media containing client information, and “cloud services” provided only by large, highly-regarded firms. Our employees are trained to follow specific procedures to maintain the confidentiality of our clients’ personal information.

8. Data Collection and Sharing

We collect your personal information through investment contracts, account applications, client meetings, written communication, forms, telephone calls and conversation. Information can be obtained directly from the account holder, but can also be collected from a professional advisor, intermediary, bank, other investment firm or other third party.

Below are some, but not all, of the reasons we share your personal information:

- *For everyday business purposes* – MS&S does not share non-public information from clients with non-affiliated third parties, except as required or permitted by law, to conduct its business, and as authorized to do so by our clients
- *Trade processing* – To facilitate trading, MS&S does purchases and sales of securities in agency accounts maintained for MS&S. These broker/dealers are provided only the information necessary to identify and execute the transactions
- *Tax preparation and reporting* – MS&S contracts with a non-affiliated service provider to accumulate, format and transmit investment-related tax data to the US Internal Revenue Service as required by law, and to clients on Forms 1099. Client names, addresses, dates of birth, tax identification numbers and data related to income receipts and transactions are stored in the service provider’s system.
- *Non-affiliated third parties* – We may disclose the personal information we collect to certain non-affiliated third parties, such as attorneys, accountants, auditors, contractors and persons or entities that are assessing our compliance with industry standards

How to Contact Us

If an individual wants to exercise their rights, ask questions, raise concerns or voice a complaint concerning this Notice or our privacy practices, they can contact us at the below address, or send an email to backoffice@mssadvisors.com:

Mitchell Sinkler & Starr
Two Penn Center Plaza
Suite 1320
Philadelphia, PA 19102
Phone: (215) 665-1450

Mitchell Sinkler & Starr

Mitchell Sinkler & Starr will address your request within the legal timeframes on receipt of the completed form.

REQUESTOR DETAILS (Please use black ink and BLOCK CAPITALS. Asterisked items are mandatory.)

*First Name(s)		*Last Name(s)	
<input type="text"/>		<input type="text"/>	
*Address			
<input type="text"/>			
*City/Town		*Region	
<input type="text"/>		<input type="text"/>	
*Post Code	*Country	* Date of Birth	
<input type="text"/>	<input type="text"/>	<input type="text"/> (DD/MM/YYYY)	
*Contact Number		Email	
<input type="text"/>		<input type="text"/>	

RELATIONSHIP (Only applicable to individuals)
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Please select the type of relationship you have with Mitchell Sinkler & Starr. Multiple selections can be made.

Existing Client	Client Account Number(s):
Former Client	Client Account Number(s):
Employee/Ex-Employee	
Other	

ID Document Type:	ID Number:
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(e.g., ID Card, Passport, Driver's License)

REQUEST (Only one rights request per form)

Please indicate the purpose of your request and **provide further details in the fields below.**

Right to access	Right to object to data processing activities
Right to rectification	Right to be forgotten
Right to data portability	Right to restriction of processing

Please provide further details below to allow Mitchell Sinkler & Starr to complete your request.

<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

SIGNATURE

Name of the Requestor

Signature of the Requestor

Date

GUIDANCE NOTES**Introduction**

Please read the notes carefully as they provide guidance on how to complete the sections of the form so that Mitchell Sinkler & Starr can respond to your Individual Rights Request appropriately.

Section 1 – Requestor Details

Use the Requestor Details section to provide us with the information required to identify you. The fields with an asterisk are mandatory. Please provide a contact phone number as well as an email address, if possible, so that we may contact you if necessary regarding your request.

Section 2 – Relationship

Use the Relationship section to describe the relationship you have or had with Mitchell Sinkler & Starr. Please select the option(s) carefully. If you are a client or former client, please provide your account number(s) so that we can process your request promptly.

Section 3 – Request

The individual rights that you could select are summarized below:

Please note that individuals under the regulation are referred to as data subjects.

- **Right of access** – Data subjects can request the right of access to their data.
- **Right to rectification** – Right to rectification allows a data subject to request that Mitchell Sinkler & Starr amend incorrect personal information. Please note, there may be other methods to correct information such as addresses, name changes, etc. that are more appropriate than using the Individual Rights Request form. *When invoking this right, please provide the details of the personal data that needs to be corrected.*
- **Right to be forgotten** – The right to be forgotten allows the data subject to request Mitchell Sinkler & Starr to remove any personal data that is held regarding the data subject. Mitchell Sinkler & Starr can only remove the data if it falls within the bounds of applicable regulation.
- **Right to object to data processing activities** – A data subject can request that processing activities related to their personal data are stopped. Detail must be provided regarding the processing activity you are objecting to.
- **Right to restriction of processing** – In certain circumstances a data subject can request a temporary restriction of processing activities. Please provide the detail of the processing activity you wish to restrict and why.
- **Right to data portability** – A data subject has the right to request that Mitchell Sinkler & Starr makes the personal data that was provided to them be available for electronic transfer in a structured, commonly-used and machine-readable format, and transmitted to another controller. Mitchell Sinkler & Starr will provide the requested data via secured email or secured postal delivery.