



PRIVACY POLICY

FACTS	WHAT DOES MITCHELL SINKLER & STARR DO WITH YOUR PERSONAL INFORMATION?
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Why?	Investment advisors choose how they share your personal information. Federal law gives consumers the right to limit some 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 from clients, former clients and prospective clients (collectively, “clients”) and share can include client banking, attorney and tax preparation relationships, investment holdings, tax identification numbers, current tax considerations, and personal and family information pertaining to wealth, investment requirement and objectives.
How?	All investment advisors need to share customers’ personal information to run their business. In the table below we list the reasons investment advisors can share their clients’ personal information, the reasons Mitchell Sinkler & Starr (MS&S) chooses to share, and whether you can limit the sharing.

Reasons we can share your personal information	Does MS&S share?	Can you limit this sharing?
For our 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 (see below), and as authorized to do so by our clients.	Yes	No
Trade processing – To facilitate trading, MS&S purchases and sells securities through broker/dealers in agency accounts maintained for MS&S. These broker/dealers are provided only the information necessary to identify and execute the transactions.	Yes	No
Tax Preparation – MS&S contracts with a non-affiliated service provider to accumulate, format and transmit investment-related tax data to the 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 computer system.	Yes	No



MITCHELL SINKLER & STARR

Non-affiliated third parties – In accordance with Section 248.13 of SEC Regulation S-P, we may disclose all the 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.	Non-affiliated third parties can only use your information for the purposes we have agreed upon. We do not disclose any client information for compensation.	No
For affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share

Who is providing this notice?	This notice is provided by Mitchell Sinkler & Starr (MS&S), a registered investment advisor.
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How does MS&S 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 secured files and buildings, computer safeguards, physical destruction of records and media containing client information, and using "cloud services" provided only by large, highly-regarded firms. MS&S employees are familiar with the privacy policy and are aware of the requirement to adhere to it.
How does MS&S collect my personal information?	We collect your personal information through investment advisory contracts, client meetings, written communication, telephone contacts and in conversation.
Why can't I limit all sharing?	Federal law gives you the right to limit only sharing for non-affiliates to market to you.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on the account.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. MS&S does not have any affiliates.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. MS&S does not share any client information with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. MS&S does not jointly market.

Notwithstanding the foregoing, we do not guarantee that our implementation of such safeguards will necessarily protect nonpublic client information.