



Sequoia Financial Advisors, LLC Privacy Policy

Sequoia Financial Advisors, LLC's (SFA) relationship with you is based on trust. Part of keeping that trust is the high priority we place on protecting the privacy of your non-public personal information. "Non-Public Personal information" is information received by SFA that identifies you or your accounts. The following policies apply to consumers who are present or former advisory clients of SFA.

1. SFA collects personal information to open and service client accounts and help SFA provide a high level of service. SFA does not sell client personal information to anyone, ever.
2. Unless a client has specifically authorized SFA to do so, SFA does not disclose your personal information to others aside from limited circumstances:
 - SFA may from time to time share client information with one of our affiliated companies. Due to the nature of our organization, SFA does share resources and office space with several affiliated companies. While SFA has implemented procedures to limit your personal information to only those employees that need to know such information to provide you services, in the normal course of business, the employees of our affiliated companies may come into contact with your personal information. The affiliated companies of SFA include Sequoia Financial Group, LLC, Sequoia Financial Insurance Agency, LLC, Long Road Risk Management, LLC, Valmark Policy Management Company, LLC, Cohen & Company, Ltd. and Cohen & Company, Ltd. affiliates such as Investment Industry Services. However, it is the policy of SFA to receive your consent prior to one of our affiliated companies contacting you regarding the affiliated company's services.
 - SFA discloses personal information to non-affiliated co-advisers, brokers and other agents, including Charles Schwab & Company, Inc. and Fidelity Investments to help SFA provide its advisory services, process your transactions and service your accounts. SFA may also provide your information to vendors providing data processing; computer software maintenance and development; compliance and legal consulting; and other general business consulting services. These vendors are contractually bound to maintaining the confidentiality of all non-public personal information.
 - SFA may also disclose personal information if SFA believes in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators, or to resolve consumer disputes.
3. SFA collects personal information in order to service your accounts and serve you better from a number of sources.
 - SFA collects information furnished by you on account applications or other forms provided by you. The information we collect may include your name; address; telephone and facsimile numbers; email addresses; Social Security number or tax identification number; and investment objectives.
 - Once you have opened an account, SFA administers your account by collecting and maintaining personal information about your transactions including balances, positions and account history.
4. To Protect the confidentiality of your personal information, SFA safeguards your personal information by limiting access to only those employees of SFA and its affiliates that provide products or services to you, to those who need access to your information to service your account, to those that must come into contact with your information as part of their job responsibilities with either SFA or an affiliate of SFA, or to outside vendors who are contractually bound to protect the privacy of your non-public information. In addition, SFA maintains physical, electronic and procedural safeguards that meet applicable legal standards to protect your non-public personal information.
5. Even if SFA ceases to provide you with financial products or services, the SFA Privacy Policy will continue to apply to you and SFA will continue to treat your nonpublic information with strict confidentiality.
6. If at any time in the future it is necessary for SFA to disclose any of your personal information in a manner inconsistent with this privacy policy statement, SFA will give you advance notice of the proposed change so that you will have an opportunity to "opt out" of such disclosure.