



PRIVACY POLICY

Last revised: 03/25/2024

State registered investment advisers, like Kerwin Asset Management, LLC (Kerwin), who disclose any non-public personal information (NPI) of clients and/or prospective clients with any non-affiliated third parties, are required to have written policies covering the handling of confidential personal information and to provide disclosure of same to their clients and prospective clients. In addition, federal law requires that such clients and prospective clients be provided a reasonable way to limit such disclosure of their NPI to non-essential non-affiliated third parties. Kerwin has chosen a stronger policy and will not share NPI with any non-essential non-affiliated third parties without client or prospective client explicit consent.

Non-Public Personal Information (NPI) Collected

Kerwin collects select NPI provided by its clients and prospective clients. Most notably, this can include but is not limited to home address(es), telephone numbers, Social Security Numbers, date of birth, financial account numbers and balances, and sources and amounts of income.

Parties to whom we may disclose personal or confidential information

Kerwin will not disclose your personal or financial information to anyone unless:

- Requested to do so by a client or an authorized client representative,
- Required by law to meet regulatory requirements, audit requirements, and/or court orders,
- Required to meet the contractual obligations of your account(s), or
- Required to provide complementary services explicitly consented to by clients or prospective clients.
 - In these situations, Kerwin has contractual arrangements with third party service providers that require them to treat your information as confidential.

How we protect the confidentiality of current and former clients' information

To safeguard your personal information from unauthorized access and use, we use a combination of electronic and physical security measures.

- We employ a cloud-based electronic client vault which provides encryption security and the ability to securely share and save electronic information.
- We will not include any NPI in emails and request clients do the same in their communication with us.
- Our computers are secured behind a protective firewall to create a barrier between them and the internet.
- All access to cloud-based client account information requires multi-factor authentication (MFA).
- We have secure office space and shred before disposing any paper containing any identifiable client information.
- Any personal information shared with non-affiliated third parties is done under a contractual obligation of confidentiality.

Types of confidential information disclosed to select third parties

The same types of personal and confidential information that Kerwin collects, may be shared with select third parties either i) providing essential services to Kerwin, or ii) providing non-essential services to Kerwin, but only for those clients or prospective clients who have given their consent. As listed above, this can include but is not limited to home address(es), telephone numbers, Social Security Numbers, date of birth, financial account numbers and balances, and sources and amounts of income.

NPI Disclosure Opt-Out

Federal law grants you the right to limit the sharing of your NPI by opting-out. If you do not want Kerwin to share any personal information to third parties providing non-essential services to Kerwin, please contact Kerwin at david@kerwinam.com.

Revisions to this Privacy Policy

Kerwin may modify this Privacy Policy at any time. If modified, Kerwin will notify you by email, which will contain an electronic attachment of the new Privacy Policy and/or a link to the new Privacy Policy on Kerwin's website (<https://www.kerwinam.com>).

If you have any questions about this Privacy Policy, please contact Kerwin using the information below.