FACTS	WHAT DOES CARNEGIE CAPITAL ASSET MANAGEMENT, LLC (DBA CARNEGIE INVESTMENT COUNSEL ("CARNEGIE") DO WITH YOUR PERSONAL INFORMATION?
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.
WHAT?	The types of personal information we collect and share depend on the product or service you have with us. This information may include, but is not limited to, the following: ● Social security number ● Risk tolerance ● Income ● Transaction history ● Assets ● Health/Medical Information ● Wire transfer instructions ● Contact Information ● Investment Experience ● Account Balances
HOW?	Financial industry companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Carnegie chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Carnegie Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your requests and transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes - information about your transactions and experiences	No (no affiliates)	N/A
For our affiliates' everyday business purposes – information about your creditworthiness	No (no affiliates)	N/A
For our affiliates to market to you	No (no affiliates)	N/A
For non-affiliates to market to you	No	We do not share

Questions?	Call Carnegie at 800-321-2322 or email us at info@carnegieinvest.com

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Who we are	
Carnegie Investment Counsel	Carnegie is an SEC Registered Investment Adviser whose principal office is in Pepper Pike, OH, with ten other offices located in California, Connecticut, Florida, New York, Ohio, and Pennsylvania. Carnegie offers ongoing portfolio management services based on individual goals, objectives, time horizon, and risk tolerance of each client. Carnegie also provides investment supervisory services that include investment strategy, asset allocation, personal investment policy, risk tolerance evaluation, asset selection, and regular portfolio monitoring. Additionally, Carnegie provides financial and investment planning. This involves planning regarding investment, retirement, cash flow projections, estate planning, insurance, education, employee benefits, family business continuation and general business consulting. Carnegie also provides financial planning advice specific for divorce situations. Carnegie also works with Retirement Plans to provide investment guidance or investment management for employer sponsored retirement plans. Carnegie is a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA") with respect to investment management services and investment advice provided to ERISA plan Clients, including ERISA plan participants.
What we do	
How does Carnegie collect my personal information?	We collect and use your personal information, for example, when you ▪ Enter into an investment advisory contract ▪ Seek financial or insurance solutions ▪ Make deposits or withdrawals from your account ▪ Tell us about your investment or retirement portfolio ▪ Give us your employment history ▪ Direct us to share with a third party
How does Carnegie protect my personal information?	To protect your personal information from unauthorized access or use, we use security measures that comply with both state and federal law. These measures include computer safeguards, employee education, enhanced third-party due diligence, and secured files and buildings. This applies to personal information we have stored, as well as disposed personal information.
Why can't I limit all sharing?	Federal law gives you the right to limit only ▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness ▪ Affiliates from using your information to market to you ▪ Sharing for nonaffiliates to market to you ▪ State laws and individual companies may give you additional rights to limit sharing.
What happens if my personal information is compromised?	We have in place an Incident Response Plan to detect, respond and recover from a privacy breach. We will notify you as soon as possible, but not later than 30 days after the incident.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. ▪ *Carnegie does not have any affiliates*
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ▪ *Carnegie does not share with nonaffiliates.*
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ▪ *Carnegie does not jointly market.*