

Pete Mitchell, Inc.

Investment Advisory Operations

Privacy Policy

PETE MITCHELL, INC.

Privacy Policy

Pete Mitchell, Inc.
5150 E. Pacific Coast Hwy. Ste. 200
Long Beach, CA 90804
714.657.3559

September 2010

PRIVACY POLICY PROCEDURES

Pete Mitchell, Inc. (PMI) is committed to safeguarding the confidential information of its clients. PMI will hold all personal information provided in the strictest confidence. These records include all personal information that PMI collects from clients in connection with any of the services provided by PMI. PMI has never disclosed information to nonaffiliated third parties, except as permitted by law. If the firm anticipates a change in its policy, PMI will advise its clients in advance.

The firm may use financial and other information that the client or their designated representatives provide to assist them in meeting their personal financial goals while guarding against any real or perceived infringements of their rights of privacy.

Notice to Clients:

PMI sends out a Privacy Policy Notice at least annually or as amended. It is PMI's intention to send it out with the annual Form ADV, Part II mailing in the first quarter of the calendar year.

Information Collected:

The categories of nonpublic personal information that PMI collects from a client depends upon the scope of the client engagement. It will generally include information about their personal finances, information about their health to the extent that it is needed for the planning process, information about transactions between the client and third parties and information from consumer reporting agencies.

Access to Information Collected:

PMI maintains a secure office and computer environment to ensure that client information is not placed at unreasonable risk.

PMI limits access to information to only employees and agents who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about a client with a brokerage firm in order to execute securities transactions on their behalf, or so that our firm can discuss the client's financial situation with their accountant or lawyer.) Employees are advised that all information, transactions, records, etc. of PMI clients is confidential and must be held in strict confidence. Employees are advised not to discuss a client's affairs with unauthorized persons including other PMI employees. For unaffiliated third parties that require access to a client's personal information, including financial service companies, consultants and auditors, PMI also requires strict confidentiality in its agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.

Client information on PMI's internal computer system is protected by access and/or by password. Access to information on PMI's system is assigned on an "as needed" basis and access by nonaffiliated third parties, if given, is protected by both access and by password.

Outside Contractors

PMI may, as necessary, use various services from nonaffiliated third parties for the purpose of supporting the financial products and services it provides to clients. These parties must agree to strict confidentiality in agreements with them and PMI expects them to keep all information private.

PMI does not provide clients' personally identifiable information to mailing list vendors or solicitors for any purpose.

Maintenance of Records

Personally identifiable information about a client will be maintained during the time they are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

Requests for Information

PMI directs a client or other interested person who has any questions about its privacy policies or procedures, to contact the CCO at (714) 657-3559 or in writing at the Corporate Headquarters, 5150 E. Pacific Coast Hwy. Ste. 200, Long Beach, CA 90804 (or the registered office of the firm if different from above).