

FACTS

WHAT DOES CALLAHAN CAPITAL MANAGEMENT, INC. 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 can include:

- Social Security Number and income;
- Assets and transaction history; and
- Investment experience and risk tolerance.

When you are *no longer* a client, we continue to share your information as described in this notice.

How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Callahan Capital Management, Inc. ("CCM") choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CCM share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	YES	NO
For our marketing purposes – To offer our products and services to you.	YES	YES
For joint marketing with other financial companies	NO	We do not share
For our affiliates' everyday business purposes – Information about your transactions and experiences.	NO	We do not share
For our affiliates to market to you	NO	We do not share
For non-affiliates to market to you	NO	We do not share

To limit our sharing

Please note: If you are a new Client, we can begin sharing your information once you sign an engagement agreement with us. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. By executing an Investment Advisory Agreement with CCM, the Client agrees to "opt-in" to this privacy policy.

Questions?

Call (970) 870-8750, email david@callahancapital.com, or go to www.callahancapital.com.

Who we are

Who is providing this notice?	Callahan Capital Management, Inc. ("CCM")
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What we do

How does CCM 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 computer safeguards and secured files and buildings.
How does CCM collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> • open an account or give us contact information; • enter an investment adviser contract or give us your income information; • tell us about your investment or retirement portfolio.
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness; • Affiliates from using your information to market to you; and • Sharing for nonaffiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account that I hold jointly with someone else?	Your choices will apply to everyone on your account – unless you tell us otherwise.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Other important information

By signing and executing Callahan Capital Management's Agreement, I acknowledge that I have fully read and understand this Privacy Policy and opt-in as outlined above. I understand that if I have any questions or concerns about this policy, it is my responsibility to discuss this with my financial professional.