

Keating Investment Counselors, Inc.

Updated September 2019

Facts	What Does KEATING INVESTMENT COUNSELORS, 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?	<p>The types of personal information we collect can include:</p> <table border="0" data-bbox="337 451 1036 640"> <tr> <td>Name</td> <td>Address</td> <td>Phone Number</td> </tr> <tr> <td>Email</td> <td>Social Security Number</td> <td>Date of Birth</td> </tr> <tr> <td>Income Assets</td> <td>Investment Experience</td> <td></td> </tr> <tr> <td>Account Numbers</td> <td>Account Transactions</td> <td></td> </tr> <tr> <td>Driver License or Passport Information</td> <td></td> <td></td> </tr> </table> <p>When you are <i>no longer</i> our client, we will continue to hold your information and share it as described in this notice.</p>	Name	Address	Phone Number	Email	Social Security Number	Date of Birth	Income Assets	Investment Experience		Account Numbers	Account Transactions		Driver License or Passport Information		
Name	Address	Phone Number														
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How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their clients' personal information, the reasons Keating Investment Counselors, Inc. chooses to share personal information, and whether you can limit this sharing.															
Who We Are/Contact Information	<p>Keating Investment Counselors, Inc. 777 EAST ATLANTIC AVENUE SUITE 303 DELRAY BEACH FLORIDA 33483 561.278.7862 http://www.keatinginvestment.com</p>															

Reasons We Can Share Your Personal Information	Does KEATING INVESTMENT COUNSELORS, INC. 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, auditors, examiners, or compliance reviews.	Yes	No
For our marketing purposes to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes—information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes—information about your creditworthiness	No	We don't share
For non-affiliates to market to you—for clients with accounts established with Keating Investment Counselors, Inc. representatives at banks or credit unions	No	We don't share

What We Do	
How does KEATING INVESTMENT COUNSELORS, INC. 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. Our online environment uses security technologies, including layered security and access controls over personal information. For further information, please visit our website or call us directly at 561-278-7862.
How does KEATING INVESTMENT COUNSELORS, INC. collect my personal information?	We collect your personal information, for example, when you: Open an account Enter into an investment management agreement Tell us about your investment or retirement portfolio Complete or reply to any questionnaires Seek advice about your investments We also collect your personal information from others such as your broker (e.g. Charles Schwab) or other companies.
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 ▪ Sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ▪ We have no affiliate companies
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ▪ Non-affiliates we may share information with include an independent representative's new brokerage or an investment advisory firm.
Joint marketing	A formal agreement between non-affiliates financial companies that together market financial products or services to you: <ul style="list-style-type: none"> ▪ This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement

Third Parties	
Third Parties we share for providing services that you have not entered into a contract with.	Third Party Software Services: Electronic Communications Archiving, Portfolio Management, Client Relationship Management, Trading Services, Research Tools Third Party Business Services: Compliance Consultants, IT Management Services, Research Services Companies, Auditors

Additional Information Regarding the KEATING INVESTMENT COUNSELORS, INC. Privacy Notice
Information for California, North Dakota, and Vermont Clients In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law

Opt-Out Notice
Keating Investment Counselors, Inc. currently has a restrictive privacy policy with no opt-out options. We will provide an opt-out form if the Privacy Policy allows more information sharing.