

Customer Privacy of Information Policy

April 2025

As our customer, you have trusted Gallacher Capital Management, LLC (“GCM”) to help you work towards financial independence. To maintain that trust, we are committed to protecting the privacy and security of the personal information that we collect about our customers. This notice is intended to help you understand how we collect, handle and safeguard that information.

We treat the personal information of our customers in a confidential manner. We do not provide any information to unrelated companies for the purpose of marketing their products or services to our customers.

When you establish a relationship with us, you are requested to furnish personal and financial information used to assist us in assessing your investment objectives and goals. In accordance with federal regulations, you may also be asked to provide identification documents or other information. The information you share with us is often private and confidential, and we are, therefore, committed to its protection. In addition to the information collected, during the course of our relationship, we may also collect a variety of non-public personal information from other sources. The confidential information we collect may include the following:

1. Information we receive from you, such as your name, address, social security number, assets, income, investment objectives and other information as required by Industry Regulators.
2. Information about your transactions, including balances, portfolio holdings, cash balances, margin balances, and customer statements. Also included may be portfolio evaluations.
3. Information we receive from our affiliated custodians (LPL Financial, Fidelity Investments, Charles Schwab), various fund sponsors, unaffiliated custodians and money managers, your accountant, attorney or other professionals retained by you.
4. Medical or health information that you, the customer, authorize us to receive from doctors or other health care providers and medical vendors in relation to life insurance policy(ies) or application(s).

We do not share customer information with any third party other than: a clearing broker that provides service for the purpose of maintaining your account; government entities or other third parties in response to subpoenas or other legal process as required by law. We may share information with affiliated/unaffiliated custodians as is necessary to provide advisory services, a third-party money manager or with broker/dealer firms having regulatory requirements to supervise certain of GCM’s activities, a Certified Public Accountant/Enrolled Agent or tax preparer if requested directly by you.

We are committed to keeping your client information secure, accurate, and current. Physical, electronic and procedural security measures are maintained that comply with applicable state and federal regulations to safeguard confidential client information. This commitment also extends to those individuals who are no longer active clients. It is your responsibility to provide accurate information and to update changes when necessary. You should always contact your financial professional with any updates and/or changes required to your personal information. It is our responsibility to keep it secure and private.

Your relationship is very important to us and we thank you for the opportunity to service your financial needs. If you have questions regarding this privacy policy, please contact us at:

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