



PRIVACY POLICY

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Johnson Bixby & Associates, LLC dba Johnson Bixby ("Johnson Bixby").

Information We Collect: In connection with providing financial advice, investment management, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, social security number, occupation, financial goals, assets, and income and;
- Information about your transactions with us, our affiliates, or others.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. ***Johnson Bixby does not sell or provide client lists and will not sell or provide your name to telemarketers.***

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Johnson Bixby, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To comply with broker-dealer firms that have regulatory requirements to supervise certain representatives' activities;
- To third parties who perform services or marketing, client resource management, or other parties to help us manage your accounts;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity upon written request by them and approval by you;
- To our attorneys, accountants, or auditors; and
- To government entities or other third parties in response to subpoenas or other legal processes as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants, and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Johnson Bixby;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with federal, state, and self-regulatory organization requirements and
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Johnson Bixby does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to clients or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red flags to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Cyber Security: Internal policies and procedures are in place to address cyber security.

Your Right to Opt Out: Federal privacy laws give you the right to restrict us from sharing your personal financial information. These laws balance your right to privacy with Johnson Bixby's need to provide information for normal business purposes. You have the right to opt out of sharing certain information with affiliated and unaffiliated companies of our firm. Choosing to restrict the sharing of your personal financial information will not apply to (1) your information that we may share with companies that help promote and market our own products or products offered under a joint agreement with another company; and (2) information about you in response to a court order. If you opt out, you limit the extent to which Johnson Bixby can provide your personal financial information to non-affiliated companies. You may opt out of the disclosure of nonpublic personal financial information to non-affiliates by contacting Johnson Bixby at (360) 695-1795.

Closed or Inactive Accounts: If you decide to close your account(s) or you become an inactive client, our Privacy Policy will continue to apply to you.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

Questions? If you have any questions concerning this Privacy Policy, please contact us at:

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