

Client Privacy Policies and Procedures

In compliance with the Securities and Exchange Commission's Regulation S-P (Privacy of Consumer Financial Information), which was adopted to comply with Section 504 of the Gramm-Leach-Bliley Act (the "G-L-B Act"), Tandem Investment Advisors, Inc. ("Tandem") discloses to clients its policies and procedures regarding the use and safekeeping of personal information, including, if applicable, how a client may avoid ("opt out" of) having his/her information shared. Tandem may collect personal, private information from our clients for a number of reasons, including determining clients' financial goals and adequately servicing clients' accounts from within Tandem and with Tandem's service providers (i.e. – broker/dealers, custodians, etc.). Tandem strictly forbids client information to be sold to anyone. We understand the importance of safeguarding client information and maintaining the privacy of our clients. Our privacy policy is set forth below:

- Tandem does not sell client information to anyone.
- Client information is only given to third-parties under the following circumstances:
 1. To broker/dealers or custodians to open a client's custody account;
 2. To other firms as directed by clients, such as accountants, lawyers, etc.;
 3. To specified family members; and
 4. To regulators, when required by law.
- Personal information is collected from clients primarily to determine accounts' investment objectives and financial goals.
- Access to clients' personal information is restricted to individuals within Tandem that require the information in the ordinary course of servicing clients' accounts. Client information is used only for business purposes. Tandem utilizes physical, electronic and procedural safeguards to protect clients' information.
- While Tandem strives to update changing client information on a contemporaneous basis, we ask clients to monitor any information provided to them by Tandem for errors.
- At times, client information may be reviewed by Tandem's outside service providers (i.e. – accountants, lawyers, consultants, etc.). Tandem will review the entities' privacy policies to ensure that clients' information is not misappropriated or used in a manner that is contrary to Tandem's privacy policies.
- In the event that these policies change, Tandem will provide its clients with a sufficient amount of time to opt out of any disclosure provisions by notifying us in writing. Nevertheless, Tandem shall provide this privacy policy to clients upon inception of the relationship. In addition, each of Tandem's active clients shall be provided with a copy of the privacy policy annually. The privacy policy shall be furnished to clients in a written format and Tandem will maintain the dates of when the privacy policy is provided to clients.