

ST. JAMES INVESTMENT COMPANY

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DALLAS, TX 75219

WWW.STJIC.COM

Privacy Policy Notice

At St. James Investment Company, we respect your personal financial privacy. We realize that you have entrusted us with private personal financial information, and it is important that you know our policy concerning what we do with that information.

We collect personal financial information about you from the following sources:

- Information you provide us in investment advisory agreements, brokerage account applications, and other documents you complete in connection with the opening and maintenance of your accounts with us; and
- Information you provide us orally; and
- Information we receive from third parties, such as brokerage firms, about your transactions with us or with others.

We do not disclose any nonpublic personal financial information about you to third parties, except in the following circumstances:

- When required to execute transactions for your account, maintain your account or otherwise to provide services you have requested; or
- Respond to court orders and legal investigations; or
- When you have specifically authorized us to do so in writing; or
- When permitted or required by law.

Information shared may include, as needed, social security numbers or other personal identifiers, financial background information, account information, transaction history, or wire transfer instructions.

Within our firm, we restrict access to your personal financial information to the employees who need to know that information to provide services to you. To ensure security and confidentiality, we maintain physical, electronic, and procedural safeguards to protect your privacy.

We reserve the right to modify, add, or remove portions of this privacy policy at any time, but only after we have provided you with written notice of any changes. Because we do not share information with non-affiliated third parties without your permission, we do not need to provide an opt-out provision.

If you have any questions about our privacy policy, please call us at 214-484-7250 x 207.

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