



PRIVACY POLICY

Rev. 2/14/2024

Lakewood Asset Management, LLC, a Registered Investment Advisor firm, is committed to safeguarding the confidential information of our clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Lakewood Asset Management. We never disclose information to unaffiliated third parties, except after receiving your expressed permission, or as required by law, and have no intentions of doing so in the future. As you know, we use financial information that you provide to us to help you meet your personal investment objectives while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below:

- 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.
- The types of personal information we collect and share depend on the product or service you have with us. This information can include: name, address, email, phone number, social security number, date of birth.
- When no longer a client, Lakewood Asset Management, LLC will continue to share information as described in this notice.
- All financial companies need to share customer’s personal information to run their everyday business. In the section below we list the reasons financial companies can share their customer’s personal information; the reasons Lakewood Asset Management, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Lakewood Asset Management 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, or report to credit bureaus as required by law	Yes	No
For our marketing purposes— to offer our products and services to you	No	We do not share
For our affiliates everyday business purposes— information about your transactions and experiences	No	We do not share
For our affiliates everyday business purposes— information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For our non-affiliates to market to you	No	We do not share

Lakewood Asset Management, LLC protects your financial information from unauthorized access and use. Lakewood Asset Management, LLC uses security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.



PRIVACY POLICY

Rev. 2/14/2024

Lakewood Asset Management, LLC needs your personal information when opening new accounts, for tax reporting purposes, and when providing the custodian with bank instructions to transfer funds.

The federal law gives you the right to limit only:

- 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.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none">▪ Lakewood has no Affiliates
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none">▪ Examples: Charles Schwab, Morningstar, and Redtail Technology
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Questions?
Call your Investment Advisor Representative: Brooks J. Call (612)965-4110, Todd J. Mick (312)543-1772, Michael J. Lannan (708)351-1058