

Privacy Policy

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policy and procedures that we have implemented to safeguard your nonpublic personal information.

Willis Investment Counsel (WIC) is committed to maintaining the confidentiality, integrity, and security of personal information we obtain from our clients. WIC holds all personal information provided by clients in the strictest confidence and it is the objective of WIC to protect the privacy of all clients. Except as permitted or required by law, WIC does not share confidential information about clients with non-affiliated parties.

To conduct regular business, WIC may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to WIC
- Information about the client's transactions implemented by WIC or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service and provide related services for client accounts, it is necessary for WIC to provide access to client information within the firm and to non-affiliated companies with whom WIC has entered into agreements (such as firms that provide custodial, brokerage or accounting services on behalf of WIC and its clients). To provide the utmost service, WIC may disclose the information below regarding clients and former clients, as necessary, to companies to perform certain services on WIC's behalf.

- Information WIC receives from the client on applications (name, date of birth, address, phone number, email address, Social Security number, etc.)
- Information about the client's transactions with WIC or others (portfolio information, transaction history, parties to transactions, investment experience, etc.)

Since WIC shares non-public information solely to service client accounts, WIC does not disclose any non-public personal information about WIC's clients or former clients to anyone, except as permitted by law. However, WIC may also provide client information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that WIC has a change to its client privacy policy that would allow disclosure of non-public information not covered under applicable law, WIC will allow its clients the opportunity to opt out of such disclosure.