



## 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 non-public 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 Federal law, WIC does not share confidential client information with non-affiliated parties.

### TYPES OF NON-PUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect non-public personal information about you that is either provided to us by you or obtained by us with your authorization. This can include, but is not limited to, your social security number, date of birth, banking information, financial account numbers and balances, and sources of income.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

- For everyday business purposes – such as administering, managing, and providing related services for client accounts.
- 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.
- 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 client).

If you are a new client, we may share your information when you sign our agreement. When you are no longer our client, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

WIC requires service providers that have access to client information (such as custodians, brokers, and technology vendors) to maintain appropriate safeguards to protect your information and to use such information only for authorized purposes.

### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING - OPTING OUT

Federal law allows you to limit certain types of information sharing. However, WIC shares client information only as necessary to service your account or as required by law. As a result, in many cases, there may be limited ability to restrict such sharing.

### PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENTS' INFORMATION

WIC uses a combination of administrative, technical, and physical safeguards to protect your personal information. These include:

- Restricted access to client information based on business need
- Secure systems with password protection and, where appropriate, multi-factor authentication
- Encryption of sensitive information
- Secure storage of physical documents
- Ongoing monitoring of systems and controls

### PROTECTION OF INFORMATION AND RESPONSE TO SECURITY INCIDENTS

WIC maintains physical, electronic, and procedural safeguards designed to protect your non-public personal information, including that of current and former clients. These safeguards include secure systems, restricted access to information, and monitoring designed to prevent unauthorized access.

In the event of a security incident involving unauthorized access to your personal information, WIC will investigate the matter promptly and will notify affected clients as soon as practicable in accordance with applicable law. Notifications will include information about the incident and steps you may take to protect your information.

### DEFINITIONS:

Affiliates - companies related by common ownership or control. They can be financial and/or non-financial companies.

Non-affiliates - companies not related by common ownership or control. They can be financial and/or non-financial companies.

*Please call our office if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are all very important to us.*