

FACTS

WHAT DOES TWELE CAPITAL MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share 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. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security Number • Investment Experience • Income, Expenses and Assets • Account Transactions and Risk Tolerance
How?	All financial companies need to share client's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client's personal information, the reasons Twele Capital Management, Inc. chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Twele Capital Management, Inc. 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	YES	NO
For our marketing purposes — to offer our products and services to you	YES	NO
For joint marketing with other financial companies	NO	We Do Not Share
For our affiliates' everyday business purposes and for our affiliates to market to you	N/A – Twele Capital Management, Inc. has no affiliates	N/A
For nonaffiliates to market to you	NO	We Do Not Share

Questions?	Please call (952) 887-9253
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Who is providing this notice?	Twele Capital Management, Inc.	

What we do	
How does Twele Capital Management, Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Twele Capital Management, Inc. collect my personal information?	We collect your personal information, for example, to: <ul style="list-style-type: none"> • Set up new accounts • Develop/revise your Investment Policy Statement • Request changes to your account
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account – unless you tell us otherwise.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Twele Capital Management, Inc. has no affiliates.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies such as custodial firms, accountants or attorneys.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.