

## PRIVACY NOTICE

Argent Capital Management, LLC is committed to maintaining the confidentiality and security of the personal information collected from our potential, current and former clients. The proper handling of personal information is one of our highest priorities and we feel it is important for you to understand the measures taken to protect your privacy. The following outlines how we use information collected from you and the measures taken to safeguard that information. It is our policy that we will never sell your information to any outside parties.

### YOUR INFORMATION

We collect and keep only information that is necessary for us to provide services as requested by you and to administer your business with us. The following nonpublic personal information may be collected:

- Information we receive from you on investment advisory agreements, client information forms and written or electronic correspondences – including, but not limited to, your name, address, phone number, tax ID number, assets, income and date of birth; and
- Custodian account statements, which may include transactions with independent broker/dealers – including account numbers, account balances, cost basis information and similar records.

### DISCLOSURE OF YOUR INFORMATION

We will not disclose any nonpublic personal information about you to anyone unless it is necessary to implement your transactions with us, at your direction or required by law. If you decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice.

### SHARING YOUR INFORMATION

We may use information collected from you to administer your accounts, funds and records. For example, we and our service providers may use the information collected to evaluate your financial needs, carry out your instructions or to comply with U.S. Securities and Exchange Commission laws and regulations. Such service providers have a legitimate business need to see your personal information in order for us to provide our services to you. We require these providers to strictly maintain the confidentiality of your information and to abide by all applicable laws. As permitted by law, we may disclose nonpublic personal information about you to:

- Companies with whom you enter into an agreement to provide financial advice and planning;
- Non-affiliated third-parties, such as outside providers that perform services for us including, but not limited to, recordkeeping, custodial administration and proxy voting services; and
- Good faith disclosures to regulators with regulatory authority over Argent.

### SAFEGUARDING YOUR INFORMATION

Your personal account information is restricted to those employees who need access to such information in order to provide investment advisory services to you. Argent also maintains physical, electronic and procedural safeguards to protect your personal financial information. If Argent shares your information with a third-party service provider, we direct each provider to adhere to our privacy policy.

### ANNUAL NOTICES

We provide our *Privacy Notice* to each client at least once per year, as federal and state laws require. We reserve the right to modify this policy at any time. If you have additional questions regarding Argent's *Privacy Notice*, questions regarding other written disclosures, or would like to request a copy of our ADV II (Disclosure Brochure), please contact our Chief Compliance Officer, Laurie Hayek, at Argent Capital Management, LLC, 100 South Brentwood Blvd., Suite 110, Clayton, MO 63105 or at (314) 725-6000.

## **BUSINESS CONTINUITY PLAN**

Argent Capital Management, LLC maintains a *Business Continuity Plan*, which would guide our response to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, responding to actual events will require some flexibility. With that in mind, we provide you with this information regarding our *Business Continuity Plan*.

### **OUR BUSINESS CONTINUITY PLAN**

After a significant business disruption, we plan to quickly recover and resume business operations by:

- Safeguarding our employees' lives, client assets and our property;
- Making timely and prudent financial and operational assessments;
- Protecting Argent's books and records; and
- Servicing the needs of our clients.

In short, our business continuity plan is designed to enable us to resume operations as quickly as possible following a significant business disruption.

Our business continuity plan addresses:

- Data back-up and recovery;
- Availability of mission critical systems;
- Financial and operational assessments;
- Alternative methods of communication with clients, employees and regulators;
- Critical supplier, custodian and third-party contractor impact;
- Alternate physical location for employees;
- Regulatory reporting; and
- Ensuring our clients receive prompt access to their funds and records.

### **VARYING DISRUPTIONS**

Significant business disruptions can vary in scope and location – ranging from Argent's office to the building, business district, city or region in which we are located. Within each of these areas, the severity of the disruption can also range from minimal to severe. In a business disruption situation, we plan to continue business, transfer operations to our alternate site(s) and notify you by our website, phone recordings and phone calls.

### **ANNUAL NOTICES**

Argent's *Business Continuity Plan* is subject to an annual testing, review and update. In addition, our regulators will periodically review the plan for compliance. If you have any questions relating to these matters, please contact our Chief Compliance Officer, Laurie Hayek, at Argent Capital Management, LLC, 100 South Brentwood Blvd., Suite 110, Clayton, MO 63105 or at (314) 725-6000.



**Laurie Hayek**  
**Chief Compliance Officer**

*Please inform us if you have any changes to your financial situation, investment objectives, specific account requests, or if you are not receiving statements (at least quarterly) from your account custodian.*