

Privacy Policy (as amended January 2023)

Toomey Investment Management, Inc.
420 Center Street 1st Floor
Wallingford, CT 06492

Toomey Investment Management, Inc., (TIMI), an independent financial services firm, respects the privacy of any nonpublic, personal information that clients provide in order for us to analyze financial situations, open and service their accounts. We are committed to safeguarding that information by holding it in the strictest confidence. We gather only the information that is necessary for us to effect, administer, or enforce activities that a client authorizes or requests. Such information may include health and financial information that has been gathered from account applications and other forms needed to service accounts.

To further protect our client's privacy, we have policies in place to restrict third party access to personal information. Subsequent to our due diligence, we may disclose personal information to other/financial institutions for the purpose of executing a transaction requested or authorized by a client, to service a product or provide a service that a client has requested or authorized or to facilitate client services and development. It has been the policy of Toomey Investment Management, Inc. not to disclose nonpublic, personal information to nonaffiliated third parties, except as permitted by law or without explicit contractual guarantees of security and privacy, and we do not anticipate doing so in the future.* If we change this policy in the future, you will be notified prior to the implementation of the new policy.

In addition, TIMI has long-recognized the potential threat related to all electronic media and communications. Accordingly, we have multiple layers of dedicated technology in place, including:

- **off-site encryption and back-up of daily records**
- **complex firewall with activity log retention**
- **anti-virus software**
- **monthly penetration testing of firewall**
- **common use of Multi-Factor Authentication***

At times, federal and state regulators also may review firm records as permitted by law. We do not provide nonpublic, personal information to mailing list vendors or solicitors under any circumstances. Any information gathered will be maintained during the time you are a client and for the required time, thereafter, that such records are required to be maintained by federal and state securities laws.

*amended language precedes in boldface