

## **SSN Privacy Protection Policy**

It is the policy of Apella Capital, LLC (the "Firm") to protect the confidentiality of all social security numbers obtained by the Firm's including but not limited to, those obtained from job applicants, clients, suppliers, vendors, consultants, and others, in the course of the Firm's business. Further, it is the Firm's policy to prohibit the unlawful disclosure of such social security numbers and to limit access to them. All Firm documents and records containing social security numbers will be kept in a secure environment. Access to such documents and records will be limited to Firm employees and agents with a need to know, who are under a written obligation to the Firm to keep the social security numbers in accordance with this Policy. Any documents, records or computer files that contain social security numbers will be destroyed, erased or rendered unreadable before disposing of them. All Firm executives, managers and employees are expected to comply with this policy and with any procedures adopted by the Firm from time to time to implement it.