

**NEASE,  
LAGANA,  
EDEN  
&  
CULLEY,  
INC.**

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## **Protecting Your Privacy and Security**

At Nease, Lagana, Eden & Culley, Inc., your privacy is a priority.

The collection and use of personal client information is fundamental to our ability to provide and administer financial products and services to you as our clients. We collect and use information for such purposes as evaluating a request for insurance, administering our products or services, evaluating benefit claims, processing requested transactions and offering additional Nease, Lagana, Eden & Culley, Inc. financial products or services.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust. The following are details of our approach to privacy.

The Nease, Lagana, Eden & Culley, Inc. privacy policy applies to any person that is a current or former client. Throughout the policy, we refer to information that personally identifies you or your accounts as “personal information”.

- 1. We do not sell your personal information to anyone.**
- 2. We do not disclose personal information to third parties, unless one of the following limited exceptions apply:**

We disclose personal information, such as account and transaction data, to companies, including financial institutions that contract with Nease, Lagana, Eden & Culley, Inc. to issue policies, execute transactions, act in a custodial capacity, etc. We have contracts with these companies that prohibit them from using your personal information for their own purposes.

We may disclose personal information to companies that help us process or service your transactions or account(s).

We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law (for example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, or for institutional risk control).

- 3. We do collect personal information in the normal course of business in order to administer your accounts and serve you better.**

*Information From Individuals.* Most information we collect is obtained directly from an individual or from that individual’s representative when applying for products or services. For insurance products, we may collect information pertaining to a person’s health, occupation, avocations, or other personal characteristics.

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A MEMBER OF THE M FINANCIAL GROUP  
SECURITIES OFFERED THROUGH M HOLDINGS SECURITIES, INC.  
A REGISTERED BROKER DEALER NASD/SIPC

We also collect information that you provide to us when you open an account, make application to or through Nease, Lagana, Eden & Culley, Inc. for the purchase of a securities product or service, or to register for one or more of our services. The information we collect may include name, address, phone number, email address, social security number, date of birth, marital status, financial information, and information about investment desires and experience. We may also collect information from consumer reporting agencies.

*Information From Third Parties.* If we need to verify information or need additional information, we may obtain information from third parties; for example, consumer reporting agencies, employers, plan sponsors, third party administrators, insurance companies, etc.

Personal information collected from individuals and third parties may vary depending upon the type of policy or service applied for by the individual. We only collect medical information in connection with underwriting insurance policies or as may be necessary for claim settlement purposes.

**4. We may share personal information with affiliated companies and regulatory agencies.**

Nease, Lagana, Eden & Culley, Inc. is a Member Firm of the M Financial Group and may offer securities and other investment services through M Holdings Securities, Inc. (“M Securities”), a subsidiary of M Financial Group. M Securities is a registered broker-dealer and investment advisor and is required by its various regulatory authorities such as the U.S. Securities Exchange Commission (“SEC”), National Association of Securities Dealers, Inc. (“NASD”), and state jurisdictions to collect, through Nease, Lagana, Eden & Culley, Inc., review, and maintain certain personal information such as investment history, financial data, and employment history in order to fulfill various regulatory requirements.

**5. We protect the confidentiality and security of your personal information.**

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of personal information to the performance of the specific service we have requested.

We restrict access to personal information to select employees and agents who have a need for such information for business purposes only. All such employees are trained and required to safeguard such information. All employees must sign a Confidentiality Agreement as a condition of employment.

We maintain physical, electronic, and procedural safeguards to guard your personal information.

**6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**

If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records and better serve you.

**7. We will provide notice of changes in our information-sharing practices.**

If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

If you have any questions or concerns, please contact us at (770) 956-1800.