



July 31, 2017

**Griffin Asset Management, Inc.**  
**Confidentiality and Security Policy**

**In compliance with Regulation S-P: Privacy of Consumer Financial Information:**

In order to properly provide our investment management services, we may obtain non-public personal information directly from you or from your transactions with us or others. We restrict access to non-public personal information about you to those employees who need to know that information to provide our investment management services to you.

Except as required by law or as specifically requested by a client, we do not disclose any non-public personal information about our clients or former clients to anyone.

We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public information.