

Privacy Policy Statement

Amended January 2026

FACTS

WHAT DOES CUTLER INVESTMENT COUNSEL DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number, date of birth, and mobile phone number
- Investment experience
- Account balances and transaction history
- Assets and income

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Cutler Investment Counsel chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Cutler Investment Counsel share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For nonaffiliates to market to you	Yes	Yes

To limit our sharing

- Call (541) 770-9000
- Visit us online: www.cutler.com

Please note:

If you are a new customer, we may begin sharing your information on the day you sign our agreement. When you are *no longer* our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions?

Call Brook Anderson (800) 2 Cutler or go to www.cutler.com

What we do	
How does Cutler Investment Counsel protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Cutler Investment Counsel collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ■ open an account ■ give us your income information ■ give us your contact information ■ tell us about your investment or retirement portfolio ■ enter into an investment advisory contract
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Artificial Intelligence	Cutler and certain third-party service providers may use artificial intelligence or other advanced technology platforms in connection with investment research, portfolio management support, and client service. These uses may include analytics, modeling, reporting, and client-facing tools that support planning, communication, and account servicing. We conduct thorough due diligence upfront and ongoing assessments of our AI tools' privacy and cybersecurity protocols to ensure they meet standards of security and confidentiality. If you have any questions, please contact us.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ■ <i>Cutler Investment Counsel doesn't jointly market</i>

Other important information	
<p>Clients may be entitled to other privacy protections under applicable state laws. We will endeavor to comply with relevant state laws that apply to the protection, use and disclosure of information about you.</p> <p><u>Information for Vermont, California and Nevada Clients</u></p> <p>In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.</p> <p>In response to a California law, we automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law. We will also limit the sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.</p> <p>Nevada law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling 1-831-759-6300. To obtain further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone 1-702-486-3132; email BCPINFO@ag.state.nv.us.</p>	