

Armbruster Capital Management, Inc.

CLIENT PRIVACY STATEMENT

The nature of our business requires us to obtain sensitive personal and financial information from our clients. As a registered investment adviser with the United States Securities and Exchange Commission (SEC), we must adopt policies and procedures to protect this nonpublic, personal information. Our policy mandates that ACM employees are prohibited from disclosing nonpublic, personal information to any person or entity outside of our firm, except as authorized by our clients to provide them with our services, or as required by an appropriate regulatory institution. We also take all reasonable measures to ensure secure transfer and/or disposal of documents containing sensitive information about our clients.

Personal Information We Collect and Maintain

Armbruster Capital Management, Inc. collects and maintains your personal information so we can provide investment management services to you. The types and categories of information we collect and maintain about you include:

1. Information we receive from you to open accounts and provide investment advice.
 - This may include personal information such as your home address, telephone number, and email address.
 - In order to facilitate the opening of accounts with brokerage firms that hold your assets, we also collect sensitive personal information such as your date of birth and Social Security number.
 - In order to provide the best possible advice and portfolio management services, we also collect personal financial information which may include information about your assets, debts, income, expenses, and other items.
 - Information that we generate to service your account (such as trade tickets and account statements);
2. Information that we may receive from third parties with respect to your account.
 - This may include items such as trade confirmations and statements from brokerage firms.

Personal Information We Disclose to Third Parties

In order for us to provide investment management services to you, we disclose your personal information in very limited instances, which include:

1. Disclosures to companies, subject to strict confidentiality agreements, that perform services on our behalf (such as our technology consultants who assist us in maintaining our computer systems).

2. Disclosures to companies as permitted by law, including those necessary to service your account (such as providing account information to brokers and custodians).

HOW WE PROTECT YOUR PERSONAL INFORMATION

To fulfill our privacy commitment at Armbruster Capital Management, Inc., we have instituted firm-wide practices to safeguard the information that we maintain about you. These include:

1. Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep your personal information safe.
2. Limiting access to personal information to those employees who need it to perform their job duties.
3. Requiring third parties that perform services for us to agree to keep your information strictly confidential.
4. Protecting information of our former clients to the same extent as our current clients.