

## FACTS

## WHAT DOES L.M. KOHN &amp; COMPANY 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. You are receiving this privacy notice because you are a client of L.M. Kohn & Company. The Gramm-Leach-Bliley Act of 1999 requires each member of the financial services industry to communicate its policy to consumers at the time of establishing a customer relationship. Furthermore, the act requires annual notification to all customers.		
What?	The types of personal information we collect and share depend on the product or service you have with us. The information we collect comes primarily from answers given to us by you. This includes such information as your name, address, and Social Security number that you have provided on applications, agreements, or other forms. In addition, we maintain records of each of your transactions and holdings.		
How?	<b>To whom we disclose the information &amp; the reasons we can share this information:</b> 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 L.M. Kohn & Company chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does L.M. Kohn & Company share?	Can you limit this sharing?
<i>For our everyday business purposes —</i> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus  <i>To other companies as necessary to process your business.</i> <i>For example, we transmit your personal information to investment companies and insurance companies. Third parties in this category, like those in the category above, must limit their use of the information to the purpose for which it was provided.</i>  <i>Where required by law or regulation.</i> <i>Examples include responses to a subpoena, court order or regulatory demand, and as part of the Anti-Money Laundering Provisions as detailed in the U.S. Patriot Act.</i>		YES	NO
<i>For our marketing purposes —</i> to offer our products and services to you		NO	We do not share
<i>For joint marketing with other financial companies —</i>  <i>To companies with whom we have joint marketing agreements. A joint marketing agreement is one in which another financial institution offers a product or service jointly with L.M. Kohn &amp; Company, such as RBC Correspondent Services, a division of RBC Capital Markets, LLC, Member NYSE/FINRA/SIPC our clearing firm for trade executions and reporting of assets, Charles Schwab for custody services and investment companies such as but not limited to SEI and CLS.</i>		YES	NO
<i>For our affiliates' everyday business purposes —</i> information about your transactions and experiences		YES	NO
<i>For our affiliates' everyday business purposes —</i> information about your creditworthiness		NO	We do not share
<i>For our affiliates to market to you</i>		NO	We do not share
<i>For non-affiliates to market to you</i>		NO	We do not share

Sharing Policy	<ul style="list-style-type: none"> <li>■ Call <b>(800) 478-0788</b> and our menu will prompt you through your choice(s).</li> <li>■ Visit us online: <a href="http://www.lmkohnandco.com">www.lmkohnandco.com</a>.</li> </ul> <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information immediately only with companies where your assets are held from the date you open an account. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. You can contact us at any time to discuss our sharing policy.</p>
Questions?	Call (800) 478-0788 or go to <a href="http://www.lmkohnandco.com">www.lmkohnandco.com</a> .
Who we are	
Who is providing this notice?	L.M. Kohn & Company, as an independent securities broker-dealer, is committed to safeguarding the confidential information of its clients. Respect for our customers' privacy has long been highly valued at L.M. Kohn & Company. Not only is it what our customers expect, it's the right way to conduct our business. Our privacy promise derives from basic principles of trust, ethics, and integrity.

What we do	
How does L.M. Kohn & Company 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 L.M. Kohn & Company collect my personal information?	The information we collect comes primarily from answers given to us by you. This includes such information as your name, address, and Social Security number that you have provided on applications, agreements, or other forms. In addition, we maintain records of each of your transactions and holdings.
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>■ Sharing for affiliates' everyday business purposes - information about your creditworthiness;</li> <li>■ Affiliates from using your information to market to you for marketing; and</li> <li>■ Sharing for non-affiliates to market to you – We do not share information for marketing.</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]</p> <p>For California residents, we will limit the sharing of your nonpublic personal information with other RBC companies to the extent required by applicable California privacy laws.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	<ul style="list-style-type: none"> <li>■ Companies related by common ownership or control. They can be financial and nonfinancial companies.</li> </ul>
Non-affiliates	<ul style="list-style-type: none"> <li>■ Companies not related by common ownership or control. They can be financial and nonfinancial companies. We only share with non-LMK affiliates upon your request as authorized by you. You may direct us, for example, to send your account statements and trade confirmations to a third party. You may direct us to provide information to other trusted advisors such as an attorney or CPA.</li> </ul>
Joint marketing	<ul style="list-style-type: none"> <li>■ A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</li> <li>■ We need to share with print and mail Companies to send communications.</li> </ul>

## Other important information

**Form CRS** – The goal of Form CRS (Customer Relationship Summary) is to inform retail investors about several important topics so they can compare firms that offer the same or substantially similar service. This document states the relationships and services a firm offers, fees and costs a retail investor will pay, a firm's disciplinary history, and how to obtain additional information about the firm. The most recent update of Form CRS can be found on our website at [www.lmkohnandco.com](http://www.lmkohnandco.com).

**Additional Disclosure Document** – In addition to disclosures made at the time of recommendation, we have our additional disclosure document available on our website at [www.lmkohnandco.com](http://www.lmkohnandco.com). This document supplements any disclosures made at the time of recommendation and gives further details on material facts related to a product or recommendation.

**Proxy Notices -**

L.M. Kohn & Company does not vote proxies on behalf of brokerage and advisory clients. All proxy material is forwarded to our clients by our clearing firm RBC Correspondent Services or the appropriate advisory custodian.

**Governing Bodies -**

Please note that you may contact the Financial Industries Regulation Authority (FINRA) at [www.finra.org](http://www.finra.org), or the Securities Investor Protection Program (SIPC) at [www.sipc.org](http://www.sipc.org) or (202) 371-8300.

**EMMA Website for Municipal Bonds** - you may now find official statements, continuing disclosure of "material events" with respect to any municipal bond issue, as well as other information about bonds you may have purchased. Log on to [www.emma.msrb.org](http://www.emma.msrb.org) and enter the CUSIP number of the municipal bonds you may purchase.

**FINRA BrokerCheck Tool** – BrokerCheck is a free tool to help investors research the professional backgrounds on current and former FINRA-registered brokerage firms and brokers. You may access FINRA BrokerCheck through the [www.finra.org](http://www.finra.org) website at [brokercheck.finra.org](http://brokercheck.finra.org) or by calling FINRA toll free at (800) 289-9999.

**Securities Investor Protection Corporation ("SIPC")** - SIPC is the first line of defense in the event a brokerage firm fails owing customer's cash and securities that are missing from customer accounts. SIPC protection does not cover a decline in the value of your assets due to market loss. You may obtain information about SIPC, including the SIPC brochure by accessing SIPC's website at: [www.sipc.org](http://www.sipc.org) or by calling: (202) 371-8300.

**Business Continuity Plan** – L.M. Kohn & Company (the "Firm") is committed to protecting our employees, clients and their assets at all times, including in times of emergency. As part of this commitment, and in compliance with internal management policy and industry regulations (FINRA, NFA, et al), the Firm maintains a business continuity plan (the Plan). The Plan provides for sustainable operating environments during any crisis/incident or major business interruption that adversely impacts the Firm's ability to conduct business. The Plan addresses various scenarios including but not limited to a departmental disruption, building, city-wide or regional disruption, or a pandemic incident. Because the Plan contains details of a confidential and proprietary nature, it is not distributed to the public.

**Client account information sent by email -**

We will send client account information securely through a system called ShareFile, a Citrix based system that requires the recipient to enter information to verify that they are the correct recipient of the information.

**Client personal information stored in third party cloud or web-based systems**

L.M. Kohn & Company (the "Firm") does not use a centralized network outside of the home office. Each branch office or associated person may hire third party vendors to manage client data which may include personal identifying information and account information. If a branch office or associated person terminates or is terminated from the Firm, then the Firm will make an immediate effort to remove access privileges from networks and systems containing access to sensitive client data. The Firm requires that associated persons disclose the use of third-party vendors including Customer Relationship Management (CRM) systems that might house some of this data. Although these systems are purchased independently from the Firm, the Firm maintains administrator access with CRM systems utilized by associated persons. This allows the ability to shut off access to these systems in the event an associated person is terminated. However, it is possible for a gap in timing to occur which allows an associated person to have access to these systems after they have been terminated. This means that a terminated associated person(s) could download or export sensitive client data either shortly before they terminate from the Firm, or shortly after they have been terminated from the Firm. The Firm makes every effort to remove access in a timely manner, and the removal of data belonging to the Firm is strictly prohibited. The Firm will take all necessary precautions to try and prevent sensitive information and client account information from being extracted outside of networks controlled by the Firm. DocuSign signatures are provided by Charles Schwab & Co., Inc. who may access your personal information during usage.

**SEC Order Handling Disclosures**

SEC regulations require that broker-dealer firms disclose to their clients, information with respect to the broker-dealer's order handling practices. These regulations require that L.M. Kohn & Company identify the different market centers to which your orders are routed and disclose any material relationship that the Firm may have with that market center, including the receipt of any payment received for sending client orders to that market center. L.M. Kohn & Company routes orders through our clearing firm, RBC Clearing and Custody. To learn more, please visit <https://www.lmkohnandco.com/sec-order-handling-disclosures>.