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Form ADV Part 2A – Disclosure Brochure

Effective: March 26, 2024

This Part 2A of Form ADV (“Brochure”) provides information about the qualifications and business practices of Paul Winkler, Inc. (“PWI” or “us” or “we” or the “Firm”). If you have any questions about the contents of this Brochure, please contact us at (615) 851-1950. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration does not imply a certain level of skill or training.

Additional information about Paul Winkler, Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. Paul Winkler, Inc.’s CRD number is 119342.

ITEM 2: MATERIAL CHANGES

This version of Paul Winkler, Inc.'s Disclosure Brochure, dated March 26, 2024, is an Annual Amendment brochure filing. It contains information regarding our qualifications, business practices, nature of the advisory services we provide, as well as a reasonable disclosure of any known and potential material conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with us. Should you have any additional questions or concerns regarding Paul Winkler, Inc. or the contents of this Brochure, please contact Bobbie Cosgrove, Chief Compliance Officer by phone at (615)851-1950.

MATERIAL CHANGES SINCE THE LAST UPDATE

This is an Annual Amendment brochure filing. Below are the material changes since our last Other Than Annual Amendment brochure, filed August 24, 2023:

- My RIA Lawyer remains Compliance Consultant for Paul Winkler, Inc.; Chief Compliance Officer has been amended to reflect Bobbie Cosgrove effective March 26, 2024
- Item 14.B has been amended to include additional language on compensation for client referrals

FULL BROCHURE AVAILABLE

We will provide a new version of the Brochure as necessary when updates or new information are added, at any time, without charge. To request a complete copy of our Brochure, contact us by telephone at (615) 851-1950.

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ITEM 4: ADVISORY BUSINESS

A. FIRM DESCRIPTION

Paul Winkler, Inc. (“PWI” or the “Firm” or “us” or “we”) is a corporation that was founded in the State of Tennessee in 2000. Paul Winkler, Inc. is a registered investment adviser firm with the Securities and Exchange Commission (“SEC”) since June 01, 2023, and was previously a state-registered investment adviser firm.

Paul Winkler is the Owner of Paul Winkler, Inc. Additional information about Mr. Winkler’s background may be found in his Form ADV Part 2B Brochure Supplement.

PWI offers a variety of investment advisory and related financial services to our clients. We provide investment advisory services, financial planning services, and retirement plan consulting services, all of which are discussed below in further detail. The products discussed throughout this Brochure are all available on a non-wrap fee basis. Our clients consist of individuals, high net-worth individuals, families, business owners and corporations.

B. TYPES OF ADVISORY SERVICES

OVERVIEW OF SERVICES

Our investment advisory services consist primarily of: (1) assessing client needs and goals; (2) financial planning designed to meet those goals; (2) implementing the asset allocation by recommending or otherwise assisting in the client’s selection of specific investment managers or passive investment vehicles that employ those strategies; and (3) reviewing and reassessing the client’s needs and goals, their investment portfolios, and repeating the process on a regular, ongoing basis.

PWI dedicates itself to understanding the intricacies of each client. For all investment advisory and related services described below, we tailor our products in accordance with the client-specific needs obtained from documented discussions, a financial plan and/ or risk assessment. Before providing investment advisory services, PWI takes multiple factors into consideration, including, but not limited to, investment objectives, investment horizon, risk tolerance, as well as any reasonable guidelines and restrictions a client may need or impose.

INVESTOR EDUCATION

Investor Coaching Workshops – We offer our expertise through educational financial workshops to clients who have engaged for financial planning and coaching services. These workshops are typically presented in groups, usually several times a month. Our presentations focus on a variety of issues, such as investments, financial planning, qualified retirement plans, success coaching and other matters that may be of interest to our clients.

The Investor Coaching Show – Our President, Paul P. Winkler, hosts a radio show and is often a guest on radio shows. Other PWI investment adviser representatives may also participate on the show. They discuss educational topics including financial planning, retirement issues, and consumer news. An internet podcast is broadcast with the same or similar educational topics. These shows do not provide individualized

investment advice. They are geared towards the public for informational purposes and are not to be construed as a solicitation for the purchase or sale of any security, nor the provision of tax or legal advice.

Website, Social Media and Workshops: We also provide blogs, web content and videos on our website and other social media and some educational workshops open to the public which address various issues of a financial nature. These offerings do not provide individualized investment advice. They are geared towards the public for informational purposes and are not to be construed as a solicitation for the purchase or sale of any security, nor the provision of tax or legal advice, and also generate prospective clients for us. Some workshops may be offered at a fee and may include other, unaffiliated persons or entities as a part of the workshops as a service or to provide education or benefits in areas we do not provide, to enrich the experience for our clients or potential clients. Any fee charged will be disclosed in advance. Although we do our best to provide these joint events with providers that are professional and act in the best interest of clients and potential clients, these persons or entities are not affiliated with PWI and we are not responsible for the products or services they provide for their non-investment related services, acts or products. Examples of this may include offering a workshop at a public restaurant, winery, or in conjunction with yoga, travel, etc.

Books: Our founder, Paul Winkler, has authored several books, many of which are available for purchase through www.amazon.com or in bookstores. His books include: *Confident Investing—Why Blind Trust Is A Poor Strategy*, *Above The Maddening Crowd*, *Confident Financial Planning- How to Build, Protect, and Enjoy Your Money* and *Confident Financial Planning*.

FINANCIAL PLANNING SERVICES

At PWI, we want our clients to understand investing and to learn how to achieve their investment objectives and financial needs. We provide personalized financial planning and coaching, designed to meet a person's individual needs in one-on-one consultations. We also make recommendations for investing based on a person's individual needs.

Before we enter into an adviser-client relationship, we offer a complimentary consultation to find out what you know about investing and what you need to learn more about. We will review some of your current investments to determine if there are any areas of concern. If there are, we will give you steps you can take to potentially get on the right track. We discuss services available, give you time to review the information we provide, and determine whether a relationship might benefit you.

If you decide to engage us, our planning and coaching services include preparing an analysis and recommended actions, an educational workshop, and implementation assistance. If you choose to implement your plan's investment recommendations through an investment manager recommended by us, you are eligible to participate in ongoing educational workshops that we provide. Services begin only after the relationship is formalized with a properly executed Coaching/Planning Engagement or Wealth Planning Agreement.

When we make recommendations for implementing the investment advice we give you, you are under no obligation to act on our recommendations. Moreover, if you elect to act on any of our recommendations, there is no obligation to affect the transaction through any company recommended. Our recommendations are based on your financial situation at the time the analysis is presented and based on financial information disclosed by you. While we do not believe it is prudent to make investment choices based on the past performance of a particular manager's track record, we do make certain assumptions about interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is

in no way an indication of future performance. We do not offer any guarantees or promises that your financial goals and objectives will be met.

If you require only advice on a single aspect of the management of your financial resources, such as a review or recommendation as to your investments in your 401(k) plan, we are available to consult with you in addressing specific areas of concern.

Subscription Service

To address the needs of those with lower financial assets but who still desire education, coaching and a comprehensive financial plan to better ensure financial success as their assets grow, we offer a subscription-based plan. This plan offers online access to eight virtual workshops with a follow up call each quarter for two years. Also included are unlimited email and phone access with a planner, a comprehensive financial plan which may include cash flow management, debt repayment, education and retirement savings, insurance recommendations, tax strategies, investment and estate planning recommendations, etc. The comprehensive financial plan is developed in 3-6 meetings with the client over the first year and includes a written financial plan deliverable. The plan also includes accountability and progress meetings (no less than twice per year), and annual review and revision meetings to keep the plan up to date.

Wealth Management Planning

Wealth planning is an evaluation of the investment and financial options available based upon your defined economic criteria and financial goals. Planning includes: (i) attempting to make optimal decisions; (ii) projecting the consequences of decisions in the form of a financial plan; (iii) implementing the protocol to achieve the objectives of the plan; and, (iv) comparing future performance against the plan.

A plan can be broad – a mutually defined review of your personal financial needs; or, segmented – review, analysis and evaluation of a core area of financial need. In general, wealth planning encompasses one or more of the following areas:

- Personal – Family records, budgeting, personal liability, estate information and financial goals.
- Education – Education IRAs, financial aid, state savings plans including 529 plans, grants and general assistance in preparing to meet dependents continuing educational needs through development of an education plan.
- Taxes & Cash Flow – Understanding the impact of various investments on your current income tax and future tax liability.
- Death & Disability – Cash needs at death, income needs of surviving dependents, estate planning and income analysis.
- Estate – Reviewing estate-planning documents, including wills and trusts, to determine if you should seek the assistance of an estate-planning attorney. Reviewing powers of attorney, nursing home and assisted living agreements, living trusts, and Medicare/Medicaid benefits.
- Retirement – Analysis of current strategies and investment plans to help you potentially achieve retirement goals.
- Investments – Analysis of investment alternatives and their effect on your investment portfolio(s), including a risk and return analysis. Assessment of your risk tolerance profile.
- Insurance – Review of existing policies to potentially ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.

First, we make a detailed assessment of what you want to achieve based on personal interviews and profile questionnaires. We meet with you to begin formally documenting goals and objectives. Then, we evaluate your goals and objectives and formulate a plan that you will be comfortable executing. In some cases, the

drafting of the plan reveals the need for us to help you reconcile the gap between expectations and financial realities. Once a viable plan has been drafted, it is presented to and reviewed with you. The draft and review process may be repeated until you are satisfied with the plan. We make recommendations for the implementation and monitoring of the plan. We usually suggest that you review the plan at least annually.

eMoney or Other Web-Based Platform – In addition to planning and coaching, we may provide our clients a web-based platform for the consolidation and maintenance of personal financial information through eMoney Advisor, LLC (“eMoney”) at no charge to our clients. This personal financial management platform helps clients to understand the impact of financial decisions, easily view progress towards their goals, and contains an electronic vault for important documents.

INVESTMENT ADVISORY SERVICES

Depending upon the results of our analysis and your individual situation, we will recommend the investment of your capital through an unaffiliated third-party asset manager (“TPAM”). The purpose of using a TPAM is to invest your assets in portfolios modeled to mirror your investment objectives and financial needs. All recommendations depend on your circumstances, goals and objectives, strategy desired, account size, risk tolerance, or other factors. You are not obligated to take advantage of any of our recommendations.

Before making recommendations, we review the TPAM’s backgrounds and consider factors, such as fees, reputation, performance, financial strength, management, price, and reporting capabilities. We will present you our recommendation based on your financial situation, goals, needs, and investment objectives.

We recommend Matson Money, Inc. (CRD #110425), who has created model portfolios, managed by them for a wide range of investment choices.

At the time of the recommendation, we provide the TPAM’s written disclosures describing its services and fees.

Generally, a TPAM is responsible for portfolio management, portfolio design, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. Our agreements with TPAMs usually require us to maintain a relationship with you, either as a referrer or as a co-advisor. If as a co-advisor, the TPAM requires us to ensure that information about your specific goals, financial situation and risk preference remain current, assist you in determining appropriate allocation models, review account activity periodically, contact you to update information or meet with you annually or upon request, and respond to your inquiries.

PWI has entered into a Co-Advisor agreement with Matson Money. Matson Money takes responsibility for investment management, portfolio design, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. PWI’s responsibilities require us to:

- Provide you with Matson Money’s disclosure brochure that describes its services and fees,
- Provide you with a written disclosure statement, titled “Co-Advisor Disclosure Statement,” that describes the fees we receive for referring you to Matson Money,
- Maintain a relationship with you,
- Ensure that information about your specific goals, financial situation and risk preference remain current and advise Matson Money of changes in this information,
- Assist you in determining appropriate allocation models,
- Review account activity periodically,
- Contact or meet with you annually, and

- Respond to your inquiries.

If you choose to go forward with these services, you will enter into a written Investment Management Agreement with Matson Money and PWI. Under this agreement, you authorize Matson Money to supervise and direct your investment accounts in accordance with the investment objectives for each account. Matson Money may accept investment restrictions you provide to Matson Money in writing.

SELECTION OF OTHER ADVISERS

We may recommend that you use the services of a third-party money manager ("TPMM") to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we may recommend that you engage a specific TPMM or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPMM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPMM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

The TPMM(s) will actively manage your portfolio and will assume discretionary investment authority over your account. We will assume discretionary authority to hire and fire TPMM(s) and/or reallocate your assets to other TPMM(s) where we deem such action appropriate.

C. TAILORED RELATIONSHIPS

At PWI, we offer the same suite of services to all our clients. The advisory services and recommendations offered by PWI are based on the individual needs of our clients and the suitability of products and services. Specific client financial plans and their implementation are dependent upon the client's risk assessment which outlines each client's current situation (income, objectives, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs and targets.

Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values and beliefs. PWI will make every effort to comply with the wishes of the client but cannot guarantee absolute adherence due to our use of indexed products, funds, and exchange traded funds ("ETF") that are controlled by custodian and its third-party service providers.

D. WRAP FEE PROGRAMS

Paul Winkler, Inc. does not participate in and is not a sponsor of wrap fee programs.

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions, and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a "bundled" form. In exchange for these "bundled" services, the clients pay an all-inclusive (or "wrap") fee determined as a percentage of the assets held in the wrap account.

E. ASSETS UNDER MANAGEMENT

When calculating regulatory assets under management, an investment adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services. As of December 31, 2023, PWI reports \$283,976,191 in client assets on a discretionary basis and \$0.00 on a non-discretionary basis.

ITEM 5: FEES AND COMPENSATION

A. FEE SCHEDULE

INVESTMENT EDUCATION AND FINANCIAL PLANNING SERVICES

To participate in the Investor Education Program, which includes a workshop and development of a financial plan, you will sign our Coaching/Planning Engagement or Wealth Planning Agreement. The Coaching/Planning Engagement Agreement requires a \$500 non-negotiable fee to be paid in advance of work being commenced. This fee may be waived or reduced in the sole discretion of the Firm.

If you implement the investment management recommendations through an investment manager recommended by PWI, you may participate in ongoing educational workshops at no additional cost to you. You may, or we may, terminate this arrangement within five (5) business days of signing the Coaching/Planning Engagement or Wealth Planning Agreement. After five business days, you may terminate the engagement at any time, but you will be billed at \$175 per hour for the number of hours we spent on the engagement to the date of termination. After this, either you may or we may terminate the agreement by providing written notice to the other. We will promptly refund any prepaid unearned fees to you.

Wealth planning fees are based on the size, complexity, and nature of your personal and financial situation and the amount of time it will take to analyze and summarize the plan. Wealth planning services are offered on a fixed fee basis. Fees range from \$2,500 to \$10,000 for the initial engagement. The fee will be disclosed before you sign the Wealth Planning Contract (“Agreement”). This Agreement will include the cost to review your financial information and prepare the comprehensive plan. One-half of the fee will be due at the time the Agreement is signed, with the remaining half due upon completion. You will have five (5) business days to terminate the Agreement without charge. Should you wish to terminate the Agreement after such time and before presentation of the plan, we will be compensated through the date of termination for time spent in design of the plan at an hourly rate agreed to by both parties in the Agreement. We will promptly refund any prepaid unearned fees to you. After the plan has been completed and presented to you, termination of the Agreement is no longer an option.

THIRD PARTY ASSET MANAGER

In addition to the advisory fee charged by PWI as outlined above, the TPAM will charge an annual percentage-based fee for their sub-advisory services of up to 1.00% *per annum*. This fee is separate and in addition to the advisory fee charged by PWI; however, the total of fees charged by PWI and the TPAM shall not exceed 2.0% of assets under management per year. The annual fee is based on the fair market or agreed upon value of the client’s account assets determined as of the last business day of each calendar month. Advisory fees are annualized and applied monthly in arrears, based on the number of days in a

month. Lower fees for comparable services by other third-party portfolio managers may be available from other sources.

For full disclosure of the TPAM's fees, please refer to the Form ADV Part 2A for the TPAM.

Matson Money Co-Advisors Program

We currently utilize Matson Money as our TPAM. When you participate in a Matson Money program, your investments bear all fund-related fees and expenses, including brokerage fees and operating expenses as well as the expenses derived from the underlying mutual funds in which the Matson Funds invest. As adviser to its funds, Matson Money receives fees of 0.49% on each fund's average daily net assets. Assets invested in shares of the Matson Funds are subject to embedded advisory and other fees and expenses, which are paid by the Matson Funds, but ultimately borne by investors. As funds of funds, the Matson Funds invest in shares of other registered investment companies. Advisers to the underlying mutual funds are paid an advisory fee by each underlying fund they manage. Thus, clients bear their asset-based share of the fees and expenses of each underlying fund as well as the Matson Fund series in which their assets are invested. No sales loads are paid to Matson Money or PWI for fund investments. Matson Money does not charge a separate advisory fee above or beyond the fees embedded in the Matson Funds.

Annual fees paid to PWI are collected by Matson Money quarterly in advance, at one-fourth of the annual rate. For non-ERISA accounts, Matson Money debits fees from your account and pays that amount directly to PWI. For ERISA accounts, Matson Money instructs your third-party custodian to debit fees and pay to PWI. Fees are based on the market value of your account on the last business day of the preceding calendar quarter.

Clients who invest in Matson Funds through different co-advisers may pay higher or lower fees to their co-adviser than other investors in the same funds. Clients pay fees generally in line with the following representative fee schedule:

Assets Under Management	Annual Rate
First \$500,000	1.00%
Next \$500,000	0.50%
Next \$3,000,000	0.40%
Next \$4,000,000 and over	0.25%

These fees may be waived or reduced in the Firm's sole discretion. Lower fees for comparable services may be available from other sources. Since each office sets its own fee schedule, some Clients may pay lower fees than the fees stated above for the same services. Also, some accounts may be under historically different fee arrangements than the representative fee schedule set forth above.

PWI will not, and has no authority to, withdraw fees from your account. You have the right to terminate your agreement with Matson Money without penalty within five business days. Otherwise, your agreement may be terminated by any of the parties by giving 30 days prior written notice to the other. Prepaid fees will be refunded by Matson on a pro-rata basis. Fees are accepted via check or PayPal and are generally refunded via the method they were received.

B. PAYMENT OF FEES

INVESTMENT ADVISORY SERVICES & THIRD PARTY MONEY MANAGERS

Unless otherwise specified, fees are charged monthly in arrears. The client's first billing cycle will be prorated based on the number of days the client's account was open and how much was funded into the account during their first month.

Fees associated with the use of the TPAM's services are paid according to the terms and conditions of the agreement between the client and the TPAM. In the event there is no agreement between the client and the TPAM, the fees will be paid pursuant to PWI's IMA and the terms and conditions discussed above regarding the fees related to our Investment Advisory Services.

EDUCATION AND FINANCIAL PLANNING SERVICES

Fees are paid by check upon receipt from PWI of an invoice outlining the fees for such services.

C. OTHER FEES AND PAYMENTS

There may be additional fees or charges that result from the maintenance of or trading within a client's account. These are fees that are imposed by third parties in connection with investments made through a client's account, such as custodial and investment fees. In addition to our advisory fees, clients are responsible for paying fees associated with investing their accounts. Please refer to Item 12 for a discussion of our brokerage practices.

D. PREPAYMENT OF FEES

INVESTMENT ADVISORY SERVICES

PWI's fees are due monthly and paid in arrears. PWI does not accept prepayment of fees for investment advisory services.

FINANCIAL PLANNING SERVICES

PWI does charge a one-time non-refundable fee in advance for financial planning services. The remaining fees due are paid in arrears.

E. OTHER COMPENSATION

Paul Winkler, owner, receives compensation for services rendered in his capacity as a therapist. Mr. Winkler does not offer these services to clients. In addition, Mr. Winkler receives compensation related to the sale of his books through Amazon or local bookstores.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

A. PERFORMANCE BASED COMPENSATION

Paul Winkler, Inc. does not assess Performance Fees.

Performance-Based Fees (“Performance Fees”) are based on a share of the capital gains or capital appreciation of the assets of a client. Our fees are calculated as described in Item 5 above.

B. SIDE-BY-SIDE MANAGEMENT

Paul Winkler, Inc. does not provide Side-By-Side Management.

“Side-by-Side Management” refers to a situation in which the same adviser manages accounts that are billed based only on a percentage of assets under management and at the same time manages other accounts for which fees are performance-based.

ITEM 7: TYPES OF CLIENTS

PWI generally provides investment advisory services to individuals, high net-worth individuals, profit sharing plans, trusts, estates, charitable organizations, and businesses.

We do not require a minimum account balance. However, your TPAM may require a minimum account balance to open and maintain your account with them, though the TPAM may reduce or waive this requirement in their sole discretion.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

A. METHODS OF ANALYSIS & INVESTMENT STRATEGIES

PWI uses the varying methods of analysis identified below to determine the proper investment strategy for each client. Our strategies are heavily based on each client’s personal circumstances, financial goals, and their risk tolerance. We utilize a blend of strategic approaches and strategies that enable us to allocate client assets by liquidity and time horizon. The Firm supports the use of Modern Portfolio, Multi-factor Theory and the Efficient Market Philosophy to create and manage portfolios.

Modern portfolio theory (MPT), developed by Nobel laureate Harry Markowitz, provides a method of constructing an investment portfolio through accounting for the correlation structure of asset returns. The correlation structure quantifies the movement between each asset in a portfolio. The objective is to find a portfolio with the highest return for any given level of risk (as measured by standard deviation).

Multi-factor theory (MFT) is a combination of various elements or factors that are correlated with asset returns. The model uses said factors to explain market equilibrium and asset prices. In multi-factor models, different factors are associated with certain characteristics (such as risk), and it helps determine the weight or importance of that factor when computing asset price or return. A typical measure of risk is beta, which measures the systemic risk of a security relative to the market. Multi-factor models are commonly used by asset managers to make investment decisions and assess the relevant risk associated with the investments.

Efficient Market Philosophy, based on the research of Nobel laureate Eugene Fama, and Kenneth French, states that all knowable information is built into market prices, and it is therefore futile to attempt to find market mispricings.

Software from Morningstar and Dimensional Fund Advisors (“DFA”) are used to analyze mutual funds and index funds on a risk-adjusted basis. Long-term market returns are used for the various asset classes and compared to their correlation between each other over time.

Asset allocation is based on the economic research related to the manner in which various asset classes have performed and the correlation of their performance over time. This involves asset allocation with periodic rebalancing and/or re-optimization of portfolios and target allocations as needed. Each client’s account is invested in accordance with the client’s asset allocation strategy. The assets are invested in specific asset class mutual funds or cash items based on target percentages of the total assets in the account. As markets fluctuate and values of account holdings change, the amounts actually allocated to each asset type in the account will either exceed or fall below the original target allocation. To correct these imbalances, the portfolio is periodically rebalanced or adjusted back to the original target by the investment manager.

In developing a financial plan for a client, PWI’s analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client’s specific situation.

The main sources of information may include client documents such as tax returns, financial newspapers, and magazines, annual reports, prospectuses, reference materials and software from Morningstar® and Dimensional Fund Advisors (“DFA”), and filings with the Securities and Exchange Commission.

B. RISK OF LOSS

Clients must be aware that investing in securities involves risk of loss of the principal.

Every method of analysis has its own inherent risks. To perform an accurate market analysis PWI must have access to current/new market information. PWI has no control over the dissemination rate of market information; therefore, unbeknownst to PWI certain analyses may be compiled with outdated market information, severely limiting the value of PWI’s analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by PWI) will be profitable or equal any specific performance level(s). PWI does not represent, warrant, or imply that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Notwithstanding PWI’s method of analysis or investment strategy, the assets within the client’s portfolio are subject to risk of devaluation or loss. The client should be aware that there are many different events that can affect the value of the client’s assets or portfolio including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Prepayment Risk:** The returns on the collateral for the deal can change dramatically at times if the debtors prepay the loans earlier than scheduled.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** This risk is associated with a particular industry or a particular company within an industry.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Risk Factors relevant to specific securities utilized include:

- **Equity Securities:** The value of the equity securities is subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and riskier than some other forms of investment.
- **Exchange Traded Funds ("ETF"):** ETFs are a recently developed type of investment security, representing an interest in a passively managed portfolio of securities selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector. Unlike open-end mutual funds, the shares of ETFs and closed-end investment companies are not purchased and redeemed by investors directly with the fund, but instead are purchased and sold through broker-dealers in transactions on a stock exchange. Because ETF and closed-end fund shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index bear the risk that the ETF's performance may not correctly replicate the performance of the index. Investors in ETFs, closed-end funds and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and other transaction costs.
- **Exchange Traded Notes ("ETN"):** ETNs are senior unsecured debt obligations of an issuer, typically a bank or another financial institution; however, ETNs are not categorized as typical fixed income products. They have a maturity date and are backed only by the credit of the underwriting bank. ETNs are linked to the performance of a particular market benchmark(s) or strategy and upon

maturity, the underwriting bank promises to pay the amount reflected in the benchmark index minus fees. ETNs are only linked to the performance of a benchmark, they do not actually own the benchmark index. ETNs also face the risk that the credit rating of the underwriting bank may be reduced, or the underwriting bank may go bankrupt, thus reducing the value of the ETN. Even though ETNs are not equities or index funds, they may face some of the risks of investing in equities or index funds.

- **Fixed Income Securities Risk:** Prices of fixed income securities tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect fixed income security prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest rates. For example, securities with longer maturities sometimes offer higher yields, but are subject to greater price shifts because of interest rate changes than debt securities with shorter maturities. Some fixed income securities give the issuer the option to call, or redeem, the securities before their maturity dates. If an issuer calls its security during a time of declining interest rates, we might have to reinvest the proceeds in an investment offering a lower yield, and therefore might not benefit from any increase in value because of declining interest rates. During periods of market illiquidity or rising interest rates, prices of callable issues are subject to increased price fluctuation.
- **Municipal Bond Risk:** Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation or other political events that could have a significant effect on the ability of the municipality to make payments on the interest or principal of its municipal bonds. In addition, because municipalities issue municipal securities to finance similar types of projects, such as education, healthcare, transportation, infrastructure and utility projects, conditions in those sectors can affect the overall municipal bond market. Furthermore, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest will be subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of the client's assets or profits.
- **Mutual Fund Shares:** Some of the risks of investing in mutual fund shares include: (i) the price to invest in mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads), (ii) investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs, and (iii) investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.
- **Options and Other Derivatives:** Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

While this information provides a synopsis of the events that may affect a client's investments, this listing is not exhaustive. Although PWI's methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Clients should understand that there are

inherent risks associated with investing and depending on the risk occurrence; clients may suffer LOSS OF ALL OR PART OF THE CLIENT'S PRINCIPAL INVESTMENT.

C. RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES

PWI does not primarily recommend a particular type of security as our recommendations are unique to each client based on their needs, goals, and risk capacity. However, investments may include, but are not limited to, exchange listed securities, fixed-income securities, over-the-counter securities, foreign securities, bonds, money market funds, and other pooled investment vehicles, such as open and closed end mutual funds or ETFs.

ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

On November 7, 2019, the Firm and Paul Winkler, its owner, entered into a Consent Agreement with the State of Alabama Securities Commission after having inadvertently exceeded the de minimis standard for operating as an investment advisor in the State of Alabama without investment advisor registration. The firm self-reported this matter when it was discovered, settled the matter, paid a fine of \$62,954.43, and is now licensed to operate in the State of Alabama. See *In the Matter of Paul Winkler, Inc., Paul Patrick Winkler*, Admin. Agreement No. CA-2019-0036.

Similarly, on June 29, 2021, the firm consented to the entry of an Order by the Texas State Securities Board after it inadvertently exceeded the threshold requiring it to change from being notice filed in the State of Texas to registered as an investment advisor. The firm self-reported this matter when it was discovered, settled the matter, paid a fine of \$5000.00, and is now registered as an investment advisor in the State of Texas. See *In the Matter of Investment Adviser Registration of Paul Winkler, Inc.*, Order No. REG21-CAF-04.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

In the interest of promoting fair, equitable, and ethical principles as a registered investment advisor, we are required to disclose when the Firm, our representatives or any of our employees may have any material conflicts of interests which may impair the rendering of unbiased and objective advice. Any known and potential material conflicts of interest that may impair the client advisory relationship are reasonably disclosed in this Brochure. Should you have any additional questions or concerns, please contact Bobbie Cosgrove, Chief Compliance Officer by phone at (615)851-1950.

A. FINANCIAL INDUSTRY ACTIVITIES

PWI is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Some of PWI's supervised persons may be registered as a registered representative of a broker-dealer.

B. FINANCIAL INDUSTRY AFFILIATIONS

PWI is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, PWI's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

PWI does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, law firm, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

D. OTHER INVESTMENT ADVISORS

PWI does not receive additional compensation from other investment advisers that it recommends to or selects for clients. However, PWI may enter into joint advisory relationships with other TPAMs to manage and service client accounts. Please see Item 4 and 5 for additional information regarding this arrangement.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION OF CODE OF ETHICS

All employees of PWI must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, PWI has adopted a Code of Ethics in its Employee Policies and Procedures Manual to specify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures relating to personal trading by PWI personnel. PWI Code of Ethics in its Employee Policies and Procedures Manual, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

PWI does not recommend or effect transactions in securities in which any related person may have material financial interest.

C. PROPRIETARY/SIMULTANEOUS TRADING

At times, PWI or its affiliated persons may buy or sell securities for its own accounts that it has also recommended to clients. However, any purchase or sale of a security by PWI or a related person will be subject to the firm's fiduciary duty to client accounts. From time to time, representatives of PWI may buy

or sell securities for themselves at or around the same time as PWI's client accounts. In any instance where similar securities are bought or sold, PWI will uphold its fiduciary duty by always transacting on behalf of the client before transacting for its own benefit. PWI will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, PWI will monitor its proprietary and personal trading reports for adherence to its Code of Ethics.

ITEM 12: BROKERAGE PRACTICES

A. SELECTION AND RECOMMENDATION

PWI seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that, overall, are most advantageous when compared to other available providers and their services.

PWI considers a wide range of factors in selecting a custodian/broker including, among others, the following:

- ✓ Timeliness of execution
- ✓ Clearance and settlement capabilities
- ✓ Ability to place trades in difficult market environments
- ✓ Timeliness and accuracy of trade confirmations
- ✓ Quality of account statements
- ✓ Research, execution facilitation, record keeping, custody, and other “value added” services provided
- ✓ Frequency and correction of trading errors
- ✓ Financial condition and willingness to commit capital
- ✓ Business reputation and integrity
- ✓ Paul Winkler's prior experience with the custodian/broker

To this end the firm utilizes Matson Money, which is independently owned and operated and is not affiliated with PWI. Generally, Matson Money requests that you open custody accounts with either Axos f/k/a ETrade Advisors Services, Charles Schwab Trust or Pershing Advisor Solutions and brokerage accounts with their affiliated broker-dealers: (1) GEMISYS Corporation or (2) Charles Schwab & Co., Inc. for personal accounts such as IRAs, non-qualified accounts, and for qualified accounts such as 401Ks. Those custodians at the present time are the only custodians allowed to hold those funds. For ERISA accounts, Matson Money generally requests that assets be maintained at Charles Schwab Trust. Matson Money will permit clients to use as a third-party administrator and recordkeeper, ASpire or Alliance Benefit Group, and Mg Trust/Matrix Capital for 403(b) accounts and some 401(k) accounts. We do not participate in any revenue sharing arrangements with these entities.

Custodian recommendations are based on the client's account size, investment objectives, trading frequency and overall portfolio strategy. The TPAM has determined that having the selected custodians execute trades is consistent with our duty to seek “best execution” of client trades.

B. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

Paul Winkler, Inc. does not currently receive “soft dollars.”

Under “soft dollar” arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items. These soft dollar benefits are attributed to the investment

advisor by reducing its expenses; however, the amount of the fee paid to the investment advisor by the client would not be reduced. Making allocations to brokerage businesses with soft dollar arrangements could enhance the ability to obtain research, optimal execution and other benefits on behalf of clients.

C. BROKERAGE FOR CLIENT REFERRALS

PWI does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

D. DIRECTED BROKERAGE

When we refer clients to a TPAM, the TPAM will direct clients to open accounts with custodians with whom the TPAM conducts business. This arrangement is designed to maximize efficiency and to be cost effective for PWI's clients. By requiring clients to use these custodians, the TPAM seeks to achieve "best execution" of client transactions.

PWI does not permit clients to direct the use of a particular brokerage firm. Not all advisors restrict clients' ability to direct brokerage. Clients may be able to direct brokerage with other advisors. If clients are able to direct brokerage, advisors may be unable to achieve the most favorable executions of transactions which in turn may cost clients more money.

E. ORDER AGGREGATION

The TPAM may, at times, aggregate sale and purchase orders of securities ("block trading") for advisory accounts with similar orders to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. The TPAM may aggregate or "bunch" transactions for a client's account with those of other clients to obtain the best execution under the circumstances.

F. TRADE ERROR POLICY

The TPAM maintains a record of any trading errors that occur in connection with investment activities of its clients. In accordance with SEC recommendations, the TPAM will bear any losses due to trading errors.

ITEM 13: REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

PWI will conduct a review of client accounts and financial plans to monitor various things, such as, third-party portfolio managers' investment performances and asset allocations, suitability, market conditions and more. The reviews also consist of determining whether a client's investment goals and objectives are aligned with PWI's investment strategies. PWI will conduct the reviews annually unless a shorter period is

requested by the client or as circumstances necessitate. The reviews are overseen by the representative of the firm.

B. INTERMITTENT REVIEW FACTORS

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify PWI promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

C. REPORTS

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the client's custodian.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS FROM OTHERS

PWI does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

PWI receives a portion of fees you pay when you participate in one of the programs offered by TPAMs. TPAMs may provide free or reduced-cost marketing assistance based on the amount of assets of PWI clients. Further, we remind you that you are under no obligation to conduct business with any TPAM recommended by us.

B. COMPENSATION TO UNAFFILIATED THIRD PARTIES

PWI pays compensation to clients, prior clients and service professionals for endorsements of the Firm, consistent with SEC Rule 206(4)-1.

In some situations, PWI may pay third-party service professionals such as an accountant or attorney a percentage of management fees for clients they refer to PWI. This arrangement complies with Rule 206(4)-1 under the Investment Advisors Act of 1940. Under this arrangement, the client will not pay additional or higher fees than other clients of PWI. This referral arrangement creates a financial incentive for these third-party service professionals to refer clients to PWI. The client or PWI reserves the right to terminate the account, in writing, at any time. Comparable services and/or lower fees may be available through other firms.

ITEM 15: CUSTODY

A. CUSTODIAN OF ASSETS

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

PWI does not have custody as it does not have the authority to deduct advisory fees from client accounts and does not maintain physical possession of client funds and securities. Rather, client's funds and securities are held by a qualified custodian in accounts that are registered in the client's name. However, your TPAM will have custody due to its ability to automatically deduct fees (including those payable to PWI) from your account/s. Please see Item 12 for additional information on our preferred, qualified custodians.

While PWI does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid directly from the custodian. Clients will receive independent statements from the Client's custodian, at least quarterly, showing all disbursements for the Account(s), including the amount of the advisory fee.

Clients are encouraged to raise any questions with us about the custody, safety, or security of their assets and our custodial recommendations.

B. ACCOUNT STATEMENTS

Although PWI is the client's adviser, the client's statements will be mailed or made available electronically by the broker-dealer or custodian. When the client receives these statements, they should be reviewed carefully. Clients should compare asset values, holdings, and fees on the statement to that in the account statement issued the previous period.

ITEM 16: INVESTMENT DISCRETION

It is customary procedure for TPAMs to have full discretionary authority to supervise and direct the investments of the client's account(s). Clients grant this authority upon execution of the TPAM's IMA. This authority is for the purpose of making and implementing investment decisions, without the client's prior consultation. All investment decisions are made in accordance with the client's stated investment objectives. Other than management fees due to PWI and the TPAM, which will be sent directly from the custodian, the TPAM's discretionary authority does not give authority to take or have possession of any assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to PWI. Furthermore, the TPAM's discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

ITEM 17: VOTING CLIENT SECURITIES

PWI will not vote proxies which are solicited for securities held in client accounts. PWI will not be required to render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the client's account may be invested in occasionally. Furthermore, PWI will

not take any action or render any advice with respect to any securities held in any client's accounts that are named in or subject to class action lawsuits. PWI will however, forward to the client any information received by PWI regarding class action legal matters involving any security held in the client's account.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET REQUIREMENT

PWI is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$1200 per client, six (6) months or more in advance.

B. FINANCIAL CONDITION

PWI does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. BANKRUPTCY PETITION

PWI has not been the subject of a bankruptcy petition at any time during the last 10 years.

PRIVACY POLICY

An important part of the relationship we have with our clients is the information they share with us. We want each client to know how we treat their private information. We keep personal information such as Social Security Numbers and account balances confidential. We take steps to safeguard this data from anyone who should not have access to it. We do not sell this information to anyone.

In dealing with Paul Winkler, Inc., clients can expect that we will take the steps outlined below to keep all their information confidential and secure.

OUR PRIVACY POLICY

In providing financial services and products (“Service”) to our clients, we collect certain non-public information about them. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to our clients, or as permitted by law. Protecting your privacy is important to us.

INFORMATION WE COLLECT

The non-public personal information we have about clients includes the information they give us when opening an account or communicating with us. This could include:

- Name and address
- Social Security Number
- Investment objectives and experience
- Financial circumstances
- Employment history
- Account balances and transactions

HOW WE SHARE YOUR PERSONAL INFORMATION

We do not sell personal client information to anyone.

Affiliates. We may share personal information about you with our affiliated companies for everyday business purposes, however, our affiliated companies are not permitted to use this information to market their products or services to you.

We do not disclose personal information about our clients to non-affiliated third parties, without expressed written consent. We may disclose anonymous information that cannot be linked to an individual client on occasion, but only to companies that we hire to help us provide products and services to our clients, or as required by law, or as authorized by the client personally, or as otherwise described in this Privacy Policy.

Service Providers. Companies and individuals that provide services on our behalf or help us operate our services and business (such as IT, hosting, investment trading, customer relationship management and support, print and mail fulfillment, data management, email delivery, etc.).

Service-Related Third Parties. Brokers, custodians, administrators, transfer agents, investment funds and their respective managed and other non-affiliated third parties as necessary to provide our services to you.

HOW INFORMATION IS USED

We use your personal information for the following purposes:

Service Delivery. We use your personal information to provide, operate, and improve the Service; execute your transactions; provide support for the service; and respond to you inquires, questions and feedback.

Compliance and Operations. We may use your personal information to: comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities; protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); audit our internal processes for compliance with legal and contractual requirements and internal policies; and prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

HOW INFORMATION IS SAFEGUARDED

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of client information. These include confidentiality agreements with companies we hire to help us provide services to clients, password-protected user access to our computer files, and strict confidentiality policies that apply to all PWI personnel, vendors and contractors.

YOUR DATA CHOICES

You have the following choices with respect to your personal information:

Decline to provide information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

How to contact us. You can reach us in the following ways:

- Mail: 3050 Business Park Circle, Suite 503, Goodlettsville, TN 37072
- Phone: (615) 851-1950