



MERISTEM FAMILY WEALTH, LLC & MERISTEM TRUST COMPANY PRIVACY POLICY

Meristem Family Wealth, LLC, Meristem Trust Company, LLC and their affiliates are committed to safeguarding the confidential information of their clients. Investment Advisory Services are offered through Meristem Family Wealth, LLC and Trust Services are offered through Meristem Trust Company.

Scope of Privacy Policy

This privacy policy describes how we treat and protect our clients' information and applies to all past and present clients of Meristem Family Wealth, LLC and Meristem Trust Company and their affiliated companies (referred to collectively as "Meristem" and the "Firm").

The Section entitled "Online Privacy: For Visitors to our Website" applies to all visitors to our Website and describes how we handle information we generally receive through our website with a home-page at <http://www.meristemfw.com> ("Website") and all related and subsidiary webpages and access to any optimized version of this Website via a wireless device. The Section entitled "Online Privacy: For Meristem Clients using Client Logins" applies to all clients or prospective clients (or a respective duly authorized representative), granted access by Meristem to certain non-public portions of the Website or service offerings otherwise made accessible through a uniquely assigned log-in from Meristem ("Client Logins").

Collecting Your Information

We collect information about you to the extent that it will assist us in helping you achieve your personal and financial goals, comply with certain laws and regulations and help design and improve our services. The categories of non-public information that we collect from a client depend upon the scope of the client engagement. We may ask for information about your identity, personal finances, transaction information between you and third parties and information from consumer reporting agencies.

Sharing and Use of Your Information within the Firm

In order to effectively administer, operate, facilitate and manage your relationship with Meristem, individuals employed by the Firm will have access to your personal information to the extent that it is necessary to service your account. Those individuals employed by the Firm who do not directly or indirectly provide services related to your account, will not be provided access to your personal financial information.

Sharing Your Information with Third Parties

We limit access to your non-public information to those having a business or professional reason by law, including, but not limited to, regulators, financial service companies, technology providers, consultants and auditors. We require strict confidentiality agreements with these third parties and expect them to keep this information private. For example, federal regulations require us to share a limited amount of information about you with brokerage firms in order to execute securities transactions on your behalf. Other examples may include individual money manager(s) managing your portfolios and/or information necessary to discuss your financial situation with your accountant or legal counsel. We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. If we make changes to our information sharing policy in the future, we will notify you in writing with an "opt-out" option prior to sharing your non-public information.

How We Protect Your Information

We maintain physical, electronic and procedural safeguards that comply with federal standards to safeguard your personal information and we continue to evaluate our efforts to ensure that your personal information is appropriately protected.

Retaining Your Information

Personally identifiable information about you will be maintained during the time you are a client of Meristem, and for the required time thereafter that such records are required to be maintained by federal and state security laws. After this required period of record retention, all such information may be destroyed without notice to you.

Accuracy of Your Information

We make every effort to keep your personal information accurate and up to date. If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us at the e-mail or phone number below so that we may promptly update our records.

Contact Us

If you have questions regarding this Privacy Policy or our privacy practices, please contact us at: info@meristemfw.com or 952-835-2577.

ONLINE PRIVACY: FOR VISITORS TO OUR WEBSITE**Automatic Data Collection and Analytics**

Like many other websites, our Website uses cookies and similar technologies. When you use our Website, our web server sends a cookie to your computer. A cookie is an electronically transmitted file that holds small pieces of information and may facilitate your use of certain features of our website by eliminating the need to re-enter information. Cookies and similar technologies may collect information such as your IP address, browser and device characteristics, referring URLs and traffic patterns on our website. Cookies do not act maliciously on computer systems. You can disable cookies by adjusting your browser preferences on your computer at any time; however in some cases, this may limit your ability to take advantage of all features on our Website.

We and our third party providers may also use web analytical tools to help gather personal information about usage of our Website and Client Login including viewing of content made available through the Client Login. These tools allow us and our third party vendors to manage and improve our Website and services and will only be used to assist and third party vendors on our behalf, in providing services.

Personal Information Submitted by You

Our Website provides a Contact Us form and may provide other types of forms that allow you to provide us with information and request information and/or register for events. You do not have to provide us with any personal information through our Website if you do not want to. If you choose to provide us with your information through our Website, we will use it to respond to your request and provide you with information about Meristem and its services.

We may share or give access to this personal information to our affiliates or other companies that we hire to perform these services on our behalf. If we share or give access to personal information to outside companies we require them to use the personal information for the limited purposes for which we shared the information. If you believe we or any company associated with Meristem has misused any of your information please contact our Chief Compliance Officer immediately and report such misuse at jrobbins@meristemfw.com or 952.835.2577.

Newsletters and Promotional E-mails

We may send you newsletters or information about Meristem and services on a periodic basis. To opt-out of any specific electronic communication that you are receiving, you can click on the opt-out button associated with the specific communication or follow the instructions to unsubscribe from future e-mails.

ONLINE PRIVACY: FOR MERISTEM CLIENTS USING CLIENT LOGIN

If you are a Meristem client or prospective client (or a respective duly authorized representative), you may have been granted access by Meristem to certain non-public portions of the Website or service offerings otherwise made accessible to you (for example, by an electronic invitation providing a link to a log-in page) through a uniquely assigned log-in from Meristem ("Client Login").

The use of Client Login services are completely optional and provided for your convenience. You can choose whether or not you would like to use these services. Our Client Logins are subscription-based services that we procure from third party providers for use by our clients.

Our Client Logins include (i) an internet-based data storage and transfer service that allows you to upload and exchange your documents with Meristem through a service provided to us by Sharefile, LLC ("Sharefile") and (ii) Envestnet/Tamarac, a division of Envestnet, Inc. ("Tamarac"), an internet-based portfolio reporting system with a dynamic on-line client portal that provides portfolio performance.

While we work with our third party providers in order to provide Client Login services to you, except as may be expressly provided in this Privacy Policy or our Terms of Use, Meristem does not control and is not responsible for the account access, record retention, and security and privacy of the Client Logins. Meristem takes, and requires its third party vendors to take, reasonable technical, organizational, and administrative security measures to protect materials that you upload or submit to us through the Sharefile and/or Tamarac services. Notwithstanding the foregoing, neither Meristem nor its third party providers shall be responsible or liable for the deletion, correction, destruction, damage, loss or failure to store any materials you submit to us through these Client Logins. Keep in mind that no method of transmission over the Internet or method of electronic storage is 100% secure.

Our Client Logins also include an internet-based on-demand video presentation delivery service that allows you to view mobile-ready content provided by Meristem through a service provided to us by Brainshark, Inc. ("Brainshark"). Meristem clients may receive invitations to log into a non-public website to view presentations on various investment topics. Meristem will be able to view and track information about when presentations are viewed, IP address and location, what portions of content were viewed and in what order, and responses to interactive questions or surveys. Individual information may be associated with this information. Brainshark's privacy practices are further described in its privacy policy at: <http://www.brainshark.com/company/privacy-policy.aspx>.

Note that if you have been granted access to a MoneyGuidePro account for online wealth management planning, such service is provided by PIETech, Inc. and your use of the MoneyGuide Pro login shall be subject to the PIETech, Inc. Privacy Policy as made available to you.

This policy was last updated November 2017.