



GHP Investment Advisors, Inc.
Registered Investment Advisor

Privacy Policy

GHP Investment Advisors, Inc. recognizes that our most important asset is our relationship with you. We understand that you have entrusted us with your private financial information and will therefore do everything we can to maintain that trust.

In order to ensure the security of your personal information:

- ◆ We do not sell your personal information to anyone.
- ◆ We protect the security and confidentiality of your personal information.
- ◆ We continually review our privacy policies and practices.

Throughout the Policy we refer to non-public information (information that personally identifies you or your accounts) as “personal information.”

A. The personal information we collect in the normal course of business is necessary to provide you with our quality products and services. We collect personal information that you provide to us when you utilize one of our services. This information includes:

- ◆ Name
- ◆ Address
- ◆ Phone number
- ◆ E-mail address
- ◆ Social Security number
- ◆ Information for preparing personal financial plans
- ◆ Information for preparing federal and state income tax returns
- ◆ Bank statements, investment statements and insurance policies
- ◆ Tax-related forms, such as W-2s, 1099s, 1098s and K-1 schedules
- ◆ Testamentary letters, trust documents and wills

This information is either provided by you or obtained by our employees with your authorization.

B. GHP Investment Advisors, Inc. only shares personal information with third parties in the following limited circumstances:

- ◆ Information is disclosed to brokerage firms that GHP Investment Advisors, Inc. uses to custody client assets. These brokerage firms maintain your accounts and help us to process account transactions, such as executing trades and withdrawing funds. We contractually require any person or organization providing such services to protect the confidentiality of our clients’ personal information.

- ◆ Information may be disclosed to other financial and investor services firms that GHP Investment Advisors, Inc. uses to service your accounts. For example, GHP Investment Advisors, Inc. currently uses the proxy voting services of Automatic Data Processing, Inc. and Proxy Governance, Inc. for clients that have previously authorized us to vote proxies on their behalf. As above, we contractually require any person or organization providing such services to protect the confidentiality of our clients' personal information.
- ◆ We may disclose personal information in circumstances where we believe in good faith that disclosure is required by law. For example, we may be required to report personal information in order to comply with regulators, law enforcement authorities or the Internal Revenue Service.
- ◆ We may disclose personal information to GHP Horwath, P.C. in order to provide you with personal financial planning, tax and other wealth management services.

The law allows you to “opt out” of certain kinds of information sharing with third parties. GHP Investment Advisors, Inc. does not share your personal information with any third parties that trigger this opt out right, except for the information sharing described in Part C.

- C.** We may share certain information that you provide to us with GHP Horwath, P.C. in order to enhance our services to you, measure your interest in our services, improve existing products and conduct joint marketing of our services. If you wish to opt out of marketing related personal information sharing with GHP Horwath, P.C., please contact Sommer Vincent at (303) 831-5055 or (800) 574-7800.
- D.** Our Systems Administrator maintains electronic protective measures to prevent unauthorized access to your personal information. The employees of GHP Investment Advisors, Inc. are trained by the Systems Administrator to protect the integrity of our electronic systems.
- E.** We maintain physical, electronic and procedural safeguards to protect the confidentiality and security of the personal information of present and former clients. Access to personal information is restricted to business purposes only. All employees of GHP Investment Advisors, Inc. are required to safeguard such information. Companies that we hire or affiliate with to provide you with our products and services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service that we have requested.