

Privacy Policy (Regulation S-P Notice)

FireTower Advisors

3005 S 21st Ave Apartment 111
Bozeman, MT 59718
406-459-6090

Effective Date: September 23, 2025

Our Commitment to Your Privacy

At FireTower Advisors, protecting your privacy is a top priority. We collect and use your personal information only as necessary to provide you with financial planning and investment advisory services.

Information We Collect

We may collect the following nonpublic personal information (NPI):

- Name, address, phone number, and email address.
- Social Security number or tax identification number.
- Financial account numbers and custodial information.
- Income, net worth, investment objectives, and risk tolerance.
- Employment information and beneficiary details.

How We Use and Share Information

We use your information only to deliver advisory services and to comply with regulatory requirements.

We do not sell your personal information. We may share NPI with:

- Your authorized custodian (Altruist) to open and maintain accounts.
- Regulatory authorities, as required by law.
- Service providers who support our operations (e.g., compliance consultants, auditors).

Safeguarding Your Information

We maintain physical, electronic, and procedural safeguards to protect your data. Access is restricted to employees and service providers who need it to perform their duties.

Your Rights

If you end your relationship with us, we will continue to maintain your information securely and only as long as required by law. You may contact us at any time to review, update, or correct your personal information.

Code of Ethics

FireTower Advisors

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Purpose

This Code of Ethics reflects our fiduciary duty to place clients' interests above our own and to uphold the highest standards of integrity in all advisory activities.

Standards of Conduct

1. Fiduciary Duty – We will always act in the best interests of our clients.
2. Integrity and Honesty – We provide advice that is objective, transparent, and free from misrepresentation.
3. Confidentiality – We safeguard all client information and only disclose it with consent or as required by law.
4. Fair Dealing – We treat all clients fairly and without preference.
5. Personal Trading – Any personal securities transactions must avoid conflicts of interest with client trades. We will never use material nonpublic information.
6. Compliance with Laws – We comply with all applicable securities laws and regulations.

Reporting and Accountability

Any violations of this Code must be reported to the Chief Compliance Officer (currently, Jay Mattfeldt).

Records of personal trading activity and outside business activities will be maintained as required by law.

Failure to comply may result in disciplinary action, up to and including termination of client relationships or regulatory reporting.

Annual Acknowledgment

All personnel (currently only the IAR, Jay Mattfeldt) must review this Code annually and acknowledge their understanding and compliance.