



## **PRIVACY POLICY NOTICE**

Financial companies choose how they share clients' personal information. Federal law gives consumers the right to limit some but not all sharing. Griffin Asset Management (GAM) is providing notice on how we handle and maintain client information. We consider the privacy of our client's personal information of paramount importance. Griffin has adopted the policy below to protect the privacy and security of the personal information that we collect about our clients.

### **Personal Information we collect**

In order for us to provide investment management services to you GAM may collect, retain, and certain "nonpublic personal information" about you for very limited purposes. This includes information such as:

- Information we receive from you on applications or other forms, including identifying information, such as name, date of birth, assets, income, home address and social security or passport number.
- Transaction information, such as account activity, account holdings, balances, debits credits, and, where applicable, account margin.
- Information received from credit reporting agencies and public records

### **Personal Information we disclose**

We do not disclose any nonpublic personal information about you or our other current or former clients to anyone, except as required or authorized by law. We do not sell, trade, or disclose non-public personal information about you to any unauthorized non-affiliated third parties.

### **How we protect your personal information**

We maintain physical, electronic, and procedural safeguards that comply with applicable federal standards to protect your nonpublic personal information. We restrict access to your nonpublic personal information to only employees who are required to know that information in order to service your account.

### **Changes to our Privacy Policy**

Our policy about obtaining and disclosing information may change from time to time. We will provide notice of any material changes to this policy before the changes are implemented.

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