

# FREEDOM TRAIL FINANCIAL, LLC PRIVACY NOTICE

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**Freedom Trail Financial values our customers and makes it a top priority to safeguard the confidential information of our customers. We are committed to protecting your privacy and maintaining your trust and confidence.**

Freedom Trail Financial collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected may vary depending on the products and services requested and the scope of your engagement with us.

## Information Collected About You

Freedom Trail Financial collects nonpublic personal information about you from the following sources:

- Information provided on applications and related forms, such as name, address, telephone number, Social Security or Tax Identification number, birth date, net worth, annual income, information about your personal finances, financial information such as bank accounts, and medical information if insurance services are provided.
- Information about your transactions with us, such as account balances, payment history, account numbers, and account activity.
- Information from your employer, association, or benefit plan sponsor regarding any group products we may provide or assist in reviewing on your behalf.
- Information from consumer reporting agencies, such as credit bureau reports and other information relating to your creditworthiness. Additionally, information may be obtained such as demographics depending on the products and services you are requesting from us.

We do not disclose information to nonaffiliated third parties about our current or former customers, except as permitted by law. However, should for any reason our policy change, we will notify you by providing you with an amended Privacy Notice prior to making disclosure of your nonpublic information to nonaffiliated third parties that are not permitted under law.

*Under Massachusetts State Law, we cannot share confidential information with non-affiliated third parties without first obtaining from you a signed statement in which you make an affirmative declaration of permission to disclose such information. Without this “opt-in” authorization from you, we are prohibited from sharing this information with non-affiliated parties.*

## Policies and Practices to Protect Your Personal Information

We train our staff to take caution in handling personal information. We restrict access to nonpublic information about you to staff that need to know such information, who assist in providing products and services to you, or who assist in the administration of the office, in order to maintain confidentiality of your information. Further, we limit staff access to information to only those who have a business or professional reason for knowing such information. Limited access is given to nonaffiliated third parties, as permitted by law, in order to execute securities transactions on your behalf, or in order to provide account maintenance or customer service on your accounts.

If you close your account, cease services with us, or become an inactive customer, we will continue to adhere to the privacy policy disclosed herein, unless we notify you by providing an amended Privacy Notice.



**Disclosure of Personal Information**

We may disclose personal information obtained from you to financial service providers that service or provide support to your accounts, as permitted under law, such as:

- Securities broker/dealers.
- Other investment advisers.
- Insurance agents and insurance companies.
- Investment companies.
- Third-party administrators and vendors hired to effect, administer or enforce transactions or services in your accounts.
- Consumer reporting agencies in connection with your application or renewal of insurance coverage.

We will not share information about you with nonaffiliated third parties, unless we have provided you with an updated Privacy Notice and provided you with an opportunity to approve or disapprove of the sharing of your information.

Additionally, we may be required by law or regulation to disclose information to third parties such as in response to a subpoena, to prevent fraud, to comply with rules and regulations to which we are subject, in response to inquiries from industry regulators, and in order to comply with our broker-dealer's policies with whom our associated persons may be registered.

We will affirm our Privacy Policy annually in writing, provided you maintain an ongoing relationship with us.