# PRIVACY POLICY Roosevelt Capital Management

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

## TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security number, date of birth, banking information, financial account numbers and/or balances, sources and amount of income, net worth and its composition, and credit card numbers.

## PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information with their affiliates and non-affiliates to run their everyday business. The reasons that we may need to share your personal information include creating and maintaining your custodial account(s), remaining compliant with state and federal regulations, legal inquiries, and / or responding to court orders and legal investigations.

## PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING - OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of sharing for nonaffiliates' everyday business purposes information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. Roosevelt Capital Management does not share information about your creditworthiness to non-affiliates except in cases where it is required by law or for those purposes required by Roosevelt Capital Management to run its everyday business. Roosevelt Capital Management does not allow non-affiliates to use your NPI to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

DEFINITIONS: Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.