



## Privacy Notice

### Our Commitment to You

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. Federal law gives clients the right to limit some but not all sharing of your personal information. In situations where a financial institution does disclose customer information to unaffiliated third parties, other than as permitted or required by law, clients must be given the opportunity to opt out or prevent such disclosure. Griffin Black, Inc. (“Griffin Black”, “we”, “our “ or “us”) values the trust our clients have placed in us and are committed to the responsible management, use, and protection of client personal information. As a Griffin Black client or potential client, you may entrust not only your financial assets, but personal information as well. When we share client or prospective client information, we do so pursuant to the practices and policies described in this document. Please take a moment to review this Privacy Notice to learn how we protect your information and use it to service your account(s).

### Applicability

If you do not agree to the terms of this Privacy Notice, please do not provide us with any information and do not use the Site. By using the site and voluntarily providing your personally information<sup>1</sup> to us, you consent to the collection and use of such personally information as set forth in this Online Privacy Notice. When you are no longer our customer, we continue to share your information as described in this Privacy Notice.

This Privacy Notice applies to this Site and all of our products and services.

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<sup>1</sup> Personal information is defined as personally identifiable information as has been described within the Gramm-Leach Bliley Act.

## Information We Collect From You

Griffin Black collects personal information about its clients to help us serve their financial needs, process transactions in their account(s), provide customer service, offer new products or services, and fulfill legal and regulatory requirements. Griffin Black collects information about its customers from the following sources:

- Information provided to us or our investment advisor representatives by our clients, such as on account applications and related forms, in discussions with our employees and advisor representatives, or through our website and which may include first and last names, birthdate, address(es), social security numbers, account numbers, income, and employment history.
- Information gathered from our internal files regarding the customer's transaction history with us (such as products or services purchased, account balances, trading history, and payment history), as well as that provided by information service companies and consumer reporting agencies (such as transactions or credit relationships with unaffiliated third parties).
- Information developed as part of financial plans, analyses or investment advisory services.
- Information provided by other unaffiliated third parties, including employers, associations, retirement plan benefit sponsors, and other institutions, if the customer transfers positions or funds to us or about the client's transactions implemented by the firm or others.

This information may include "nonpublic, personal information," which means information that is not readily known or accessible in the public realm, such as the customer's social security number, birth date, net worth, assets, income, and medical information (if applying for insurance), as well as the fact that the customer has an account with us.

We may combine the information collected on our website or through our mobile application with information collected from or about you in other contexts. This may include information collected online, such as on our website or through our email exchanges with you, or from offline sources, such as when you establish your account with us or call customer service. We will treat such combined information in accordance with this policy. If you do not wish to provide information to Griffin Black, we may be unable to provide certain products or services to you.

## Why We Collect and How We Use Information

To administer, manage, service, and provide related services for client accounts, it is necessary for Griffin Black to provide access to customer information within the firm and to unaffiliated companies, with whom the firm has entered into agreements. To provide the utmost service, we may disclose the information below regarding clients and former clients, as necessary, to companies to perform certain services on our behalf.

- Information Griffin Black receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Griffin Black

## Sharing Information

Pursuant to federal law, we do not share or otherwise disclose personal information about our clients or prospective clients without the client's prior consent. We may share your personal information when needed to complete transactions at your request or when the disclosure is needed to:

- provide the services requested by the customer, including:
  - clearing, transferring, confirming, or reconciling transactions in the customer's account(s); and
  - providing statements or other records regarding the status or value of the customer's account(s);
- provide the customer with marketing materials regarding our products and/or services, as well as those offered pursuant to with our affiliates or unaffiliated third parties, so long as all parties offering the products and/or services have agreed, in writing, to protect the confidentiality of the client's information and to not use it for any other purpose;
- enforce any of our rights, including the collection of any fees or other payments due;
- provide any of our affiliates with information regarding our operations, or as reasonably required pursuant to the proposed or actual sale, merger, transfer, or exchange of all, or a portion of, our business;
- comply with the request or requirements of regulatory and/or law enforcement organizations;
- respond to a subpoena or discovery request; or

- provide disclosures as otherwise permitted or required by law.

We may provide such information to Griffin Black's affiliates and/or unaffiliated financial or non-financial services providers (such as insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing account maintenance or customer service) as necessary pursuant to the exceptions listed above.

We do not sell, share, or disclose your nonpublic personal information to unaffiliated third-party marketing companies.

### Opting Out

Customers may request that we not disclose their nonpublic, personal information for any reason - other than one of the exceptions listed above.

To request that we not disclose your information for this or any purpose (other than those covered under the exceptions listed under "Sharing Information," above), please [contact us](#). If we do not receive such a request from you within thirty (30) days of you opening an account, contracting for services, or receiving our annual privacy notice, we have the right to assume you do not object to the disclosure of your information for any reason permitted by federal law until you notify us to the contrary. (Please note that the laws of certain states may impose additional restrictions upon the disclosure of customers' confidential information.)

### Safeguarding Information

Griffin Black recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Griffin Black authorizes access to your nonpublic personal information only to authorized employees who need that information to serve you. We utilize reasonable security technologies to protect sensitive information. We maintain physical, electronic, and procedural safeguards regarding your nonpublic, personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. However, the security of this information depends in part on the security of the computer you use to communicate with us, the security you use to protect User IDs and passwords, and the security provided by your internet access services provider. We are not responsible for the security of your internet access services provider; you should review the security and privacy policies of your internet access services provider carefully. Information that you access via this Site may be stored on your computer during your session for your convenience. If others have access to your computer or your User ID and password, they may be able to access this information. We are not

responsible for the security or privacy of information communicated to or from such a computer. Finally, you should keep any correspondence you receive relating to this Site or the Services (including, but not limited to registration information, emails, or any other information) confidential and in a safe place. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

### **Children's Information (Children's Online Privacy Protection Act)**

We respect the privacy of your children and do not knowingly collect or retain personally identifiable information from children under the age of 13 through this web site.

### **Modifications**

We will provide each client with initial notice of our current policy when the client relationship is established. We will also provide each client with the current Privacy Notice at least annually. We may modify this Privacy Notice at any time so please check from time to time for such modifications. This Privacy Notice was last updated on the date indicated above. If you have specific questions regarding this Privacy Notice or any information you have sent via the Site, please do not hesitate to contact us.

### **Former Clients**

[Our Privacy Policy continues to apply to all former clients in accordance with applicable laws, rules and regulations](#)

### **Questions**

You do not have to contact us to benefit from our privacy protections; they apply automatically to all of our customers and former customers. If you have any questions after reading this privacy policy, we encourage you to [contact us](#).

*Last Updated May 12, 2020*