

## Bolton Global Capital and Bolton Securities Corp. Privacy Policy

United States federal legislation, certain state laws and the laws of other countries, including but not limited to the European Union General Data Protection Regulation require all financial institutions to notify customers of their privacy practices. This document describes how Bolton Global Capital and Bolton Securities Corporation handle your personally identifiable nonpublic information.

**WHO WE ARE:** We are Bolton Global Capital and Bolton Securities Corporation, two affiliated securities broker-dealers registered with the United States Securities and Exchange Commission and the Financial Industry Regulatory Authority. We are also federally registered investment advisors. Our office address is 579 Main Street, Bolton, MA 01740. We provide transactional and fee-based financial services to our clients through a network of financial advisors.

**INFORMATION WE COLLECT:** While using our products or services, we may collect the following types of nonpublic personal information about you:

- Information we receive from you on applications or other forms;
- Information about your accounts and transactions with us or others;
- Information necessary to verify your identity in order to secure access to your nonpublic personal information;
- Information we receive from customer reporting agencies; and
- Other information you provide to us, include information needed for us to comply with all applicable laws and regulations governing the products and services we provide you.

**WHY DO WE COLLECT YOUR INFORMATION:** We collect your information so we can provide financial services to you. Much of the information that we collect is either mandated by law or necessary for us to provide effective services to you. These are legitimate purposes. Your honest disclosure of information is imperative. Failing to fully and honestly share your information with us will have a negative impact on the services we provide to you.

**INFORMATION WE DISCLOSE:** We respect and protect the privacy of those who use our products and services. We may disclose information about you to our staff, affiliates, representatives, their affiliated businesses, and third parties who provide you with financial products and services. Nonaffiliated third parties may include retirement plan sponsors, mutual funds companies, insurance companies, other broker-dealers, or clearing firms.

We treat information concerning our former customers the same way we treat information about our current customers. If you close your account(s) with us, we may share your nonpublic personal information with the new broker-dealer or custodian that you choose to aid in the transfer of your investments. In the event the representative servicing your account(s) leaves Bolton to join another firm, the representative is allowed to retain copies of your personal information in order to continue servicing your account(s) at the new firm. The representative remains obligated to keep your personal information confidential and is only allowed to use your personal information to service your account(s).

We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products, services or reports on your account(s), or where disclosure is prescribed by law. Bolton does not sell or share your information to nonaffiliated third parties who intend to market their products to you. In general, your information is only disclosed to recipients within the United States.

**SECURING YOUR INFORMATION:** We restrict access to your personal and account information to our employees or agents who need to know this information to provide products or services to you or need access to this information to comply with applicable laws and regulations governing the products and services we provide. We employ physical, electronic and procedural security safeguards to protect your information from loss, misuse, or unauthorized alterations. We endeavor to only retain your information for as long as necessary, which is generally three, five or six years under prevailing laws in the United States relevant to the financial services industry. We reserve the right to retain your information for longer than the regulatory retention periods mentioned herein. If we do retain your information for longer it is because the information is still required for the legitimate business interests of the company.

**OPTING OUT OF THIRD PARTY DISCLOSURES AND OTHER RIGHTS:** If you prefer that Bolton or its representatives do not disclose the nonpublic personal information about you to nonaffiliated third parties, you may opt-out of those disclosures, that is, you may direct us to not make those disclosures (other than disclosures permitted by law). If you wish to opt-out of disclosures to nonaffiliated third parties, you may contact our Compliance Department at 800-649-3883 or send a written request to Bolton Global Capital, Attn: Compliance Department, 579 Main Street, Bolton, MA 01740. If you are a citizen of an EU country, you have the right to report any failure by us to abide by this privacy policy to your local agency that handles such matters.

If you have any questions about our privacy policy, you may contact your Bolton representative or Bolton's Compliance Department at 800-649-3883.

**By signing this account agreement you certify that you have read and understand this privacy policy and explicitly agree to the collection and use of your data as described above.**