

# GLOBAL FINANCIAL PRIVATE CAPITAL, LLC

## PRIVACY NOTICE

Global Financial Private Capital, LLC (referred to as "GFPC") maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information. Through this policy and its underlying procedures, GFPC attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of GFPC to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the clients. GFPC may disclose the client's information if GFPC is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with GFPC, including but not limited to the client's other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by GFPC in order to facilitate the commencement/continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for GFPC (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

In certain situations, GFPC may share your information with parties that are not affiliated with GFPC, as described below. GFPC recognizes that you have elected to open accounts with GFPC due to the efforts for your investment adviser representative. If he or she elects to leave GFPC for another investment advisory firm, GFPC may allow your investment adviser representative to take your confidential information with him or her to the new firm, subject to the requirements or limitations of applicable law. Your client information may also be shared with a non-GFPC affiliated investment adviser representative and his or her firm if your GFPC investment adviser representative has entered into an agreement to sell all or some portion of their securities, advisory or insurance business to the non-GFPC affiliated investment adviser representative. If you do not want GFPC to share your information (other than as prescribed by law) any non-affiliate, you may contact our Chief Compliance Officer at 866-641-2186. In addition, there are certain states that require you as a client to "Opt-in" before we will share this information with non-affiliated persons. If you live in one of these states, we will ask you to sign an acknowledgement before sharing any information with a non-affiliate. Except as described above, GFPC permits only authorized employees and affiliates, who have signed a copy of GFPC's Privacy Policy, to have access to client information. Employees violating GFPC's Privacy Policy will be subject to GFPC's disciplinary process. Additionally, whenever GFPC hires other organizations to provide services to GFPC's clients, GFPC will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact the Chief Compliance Officer at 866-641-2186.



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