# **D** BECK BODE

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## PRIVACY POLICY

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

# TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

Beck Bod collects nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. Collecting this information helps us service your financial needs, help process transactions on your account a, provide customer service, and fulfill legal and regulatory requirements. This can include but is not limited to your Social Security Number, Date of Birth, Occupation. Email Address, IP Address (through use of cookies; please view our cookie policy or visit www.allaboutcookies.org for more information), Banking Information, Financial Account Numbers and/or Balances, Sources of Income, Net Worth, and Credit Card Numbers or Information. When youare no longer our customer, we may continue to share your information only as described in this notice.

## PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. We disclose nonpublic personal information about you only to those persons that provide necessary services to our investors, or as permitted or required by law, or as specifically authorized by you. The following discussion identifies categories of persons who may have access to this information.

# Within Beck Bode

Our employees are permitted access to the information they need to perform their jobs on your behalf. We maintain strict internal policies against unauthorized disclosure or use of investor information.

## Outside Service Providers

To provide necessary business services to an investor's account, we may disclose information to outside service providers, such as custodians and brokerage firms. Only the investor information necessary for them to perform their functions is shared, and service providers are required to safeguard investor information and only use it for authorized purposes.

## Courts and Regulators

Certain federal and state laws or regulations may require us to share information about you. For example, if you are involved in a legal matter with a third party, we may be ordered to provide information to a court or other party. Similarly, applicable regulators may request information concerning investors. In these circumstances, only the specific information required by law, subpoena, court order or regulatory request will be shared.

## <u>General</u>

- For everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates' and for our non-affiliates' everyday business purposes –information about your transactions and experiences and information about your creditworthiness; or
- > For affiliates and non-affiliates to market to you.

# **BECK BODE**

If you are a new customer, we may begin sharing your information on the day you sign our agreement. When youare no longer our customer, we may continue to share yourinformation as described in this notice. However, you can contact us at any time to limit our sharing.

#### 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. Beck Bode authorizes access to your nonpublic personal information only to personnel who need that information to serve you. 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.

#### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING

#### **OPTING OUT**

As a customer of Beck Bode, you may request that we do not disclose your NPI by "opting-out" of the following:

- sharing for non-affiliates' everyday business purposes – information about your creditworthiness;
- or sharing with affiliates or non- affiliates who use your information 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:**

- <u>Affiliates</u> companies related by common ownership or control. They can be financial and nonfinancial companies;
- <u>Non-affiliates</u> companies not related by common ownership or control. They can be financial andnonfinancial companies;
- Joint marketing a formal agreement between nonaffiliated financial companies thattogether market financial products or services to you.

Please call (617-209-2224) or email (<u>invest@beckbode.com</u>) 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.