

# **GROWTHPOINT INVESTMENTS, LLC**

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We at GrowthPoint Investments, LLC (GPI) respect the confidentiality of our clients' non-public, personal information. It is our intention to ensure that this information is safeguarded to protect against its misuse. To that end, we are providing you with a copy of our current Privacy Policy to remind you of our concern for and our efforts related to the protection of, your personal, non-public information.

## **WHY AND HOW WE COLLECT PERSONAL INFORMATION**

When you enter into an financial advisory agreement to establish a managed account with GPI, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. The personal information we collect about you includes:

information you provide to us on applications and other forms, such as your name, address, telephone numbers, date of birth, social security number, occupation, net worth, and income;

information about your prior trading history;

information you provide to us to verify your identity, such as a passport,

or information received from other entities not affiliated with the Company.

## **GPI'S PRIVACY POLICY**

All information given to GPI and all recommendations and advice furnished by GPI to its clients will be kept confidential and will not be disclosed to anyone, except as GPI may so agree in writing or as may be required to do so by law.

As part of GPI's policy, GPI restricts access to confidential personal information about its clients to those GPI employees who need to know that information in order to provide products or services to its clients. GPI maintains physical, electronic, and procedural safeguards to comply with federal standards to guard its clients' confidential personal information. We do not rent or sell your name or personal information to anyone.

Should a client agree to accept financial advisory services provided by GPI, GPI may share the client's non-public, personal information (NPI) with non-affiliated third parties in order to support the financial products and services we provide to you. GPI may or may not maintain agreements with various affiliated or non-affiliated entities that may act as the custodian and account holder for customers of GPI. Furthermore, GPI may engage third party companies to perform services for us or on our behalf, such as vendors that prepare and mail performance reports, compute GPI's management and incentive fees or provide data processing, computer software maintenance and development, transaction processing and marketing services. These third-party institutions may require agreements to establish a GPI client's account with them. GPI will share only the appropriate customer NPI needed to facilitate these account

agreements on behalf of its clients. Also, we may disclose personal information with regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

Should you prefer, GPI will not disclose confidential personal information about you to non-affiliated third parties. You may opt out of such disclosures; that is, you may direct GPI not to make those disclosures (other than disclosures required or permitted by law). Should you wish to opt out of disclosures to non-affiliated third parties, please contact us at the following number: **(678) 254-3250**.

We endeavor to keep our client files complete and accurate. We will give you reasonable access to the information we have about you. Most of this information is contained in performance reports and billing statements that you may receive from us and account applications that you submit to obtain our advisory services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have a question or concern about your personal information or this privacy notice, please contact your account representative.