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## **PRIVACY POLICY NOTICE**

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*Winthrop Partners – WNY, LLC, and affiliated firms, the (“Firms”)*

The Firms have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

### **WHAT INFORMATION WE COLLECT**

We collect certain non-public personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications, agreements or other forms, as well as communications (electronic, telephone, written, or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

### **WHAT INFORMATION WE DISCLOSE**

We do not disclose the non-public personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

### **SECURITY OF YOUR INFORMATION**

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

### **CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU**

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change. If you have any questions regarding any aspect of our Privacy Policy, please contact Kyle Bubeck, our Chief Compliance Officer, at 913-239-0100.