

Brighton Securities Corp. California Consumer Privacy Act Notice and Notice at Collection

Reviewed: 12/01/2025

This California Consumer Privacy Act Notice at Collection (“Notice”) is provided by Brighton Securities Corporation and its affiliates (collectively referred to in this Notice as “Brighton Securities,” “we,” or “us”).

This Notice explains how we collect, use, retain, and disclose personal information about California residents, and describes the rights that California residents have under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (the “CCPA”). The CCPA applies only to information about residents of California.

Applicability of This Notice

Covered Personal Information: Under the CCPA, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. In this Notice, we refer to such information as “Personal Data.”

Non-California Residents: If you are a resident of another U.S. state, you may submit a request under this Notice. While the CCPA does not require us to process requests from non-California residents, we may choose to do so. In such cases, we will apply the same limitations and exceptions under the CCPA as apply to requests made by California residents. We reserve the right to change or discontinue this practice, except as otherwise required by law.

Other Privacy Laws: This Notice does not apply to Personal Information that we protect under other laws, such as the Gramm-Leach-Bliley Act (GLBA) or the Health Insurance Portability and Accountability Act (HIPAA). It also does not apply to Personal Information collected in connection with the products and services we provide as a broker-dealer or investment adviser (e.g., retirement planning, financial planning, or asset management). For those activities, please refer to our GLBA Privacy Notice for a description of our practices and your rights.

Who We Are

Who is providing this notice: Brighton Securities Corp. and Brighton Securities Tax Services, Inc., each a wholly owned subsidiary of Brighton Securities Holdings Inc.

Information We Collect

We collect Personal Information as defined by the CCPA (“Personal Information”) as part of our business. In the year before the date this policy was issued or last updated, we may have collected the following categories of Personal Information from consumers:

Category	Examples	Collected
Identifiers	Name, address, SSN, Drivers License or Passport.	Yes
Customer Records Information	Name, Signature SSN, Physical Characteristics or description, address, phone number, passport/drivers license number, state ID card, insurance policy number, any other financial or medical information.	Yes
Protected Classification Characteristics	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical conditions, physical or mental disability, sex, veteran or military status	Yes
Commercial Information	Records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies.	Yes
Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information such as fingerprints, faceprints and voiceprints.	No
Internet or Other Electronic Network Activity	Browsing history, search history, information on a consumer’s interaction with a website, application or advertisement.	Yes
Geolocation Data	Physical location or movements	No
Sensory Data	Audio, electronic, visual, thermal, or similar activity.	No
Professional Or Employment Information	Current or past job history.	Yes
Non-Public Education Information	Education records directly related to a student maintained by an educational institution.	No
Inferences	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	Yes
Sensitive Personal Information (added by CPRA not already covered above)	Account Log in, financial account number in combination with any required security code or access code, password, or credentials allowing access to an account.	Yes

Sources of Personal Data

We receive the categories of Personal Information listed above from the following categories of sources:

- Directly from you, information that you provide when you interact with Brighton Securities or one of our Financial Professionals through, for example, physical (paper application), audible (by phone), and electronic (website, social media) sources.
- Publicly available sources, including information from the media, and information that is made available by federal, state and local government entities (e.g. professional licenses.)
- Information shared by third party service providers or vendors that perform functions on behalf of Brighton as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. (e.g. custodians that provide financial services to our clients, fraud prevention and underwriting.)
- Personal information that we derive or infer from other personal information.
- Automatically collected data gathered through tracking technologies such as cookies, pixels or mobile apps.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide financial services to you
- To provide you with other information, products, or services that you request from us
- To create, maintain, customize, and secure your account with us
- To process your requests and transactions
- To provide you with notifications, reports, statements, invitations, and other notices concerning products, services, events, or news that you may request or that may be of interest to you
- To carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing
- To improve our website and electronic communications and present their contents to you
- To respond to regulators (e.g., SEC), external auditors, law enforcement and other governmental agencies, as required by applicable law or court order

- As described to you when collecting your personal information or as otherwise set forth in the CCPA

We will not collect additional categories of your personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you with advanced notice.

Sharing of Personal Information

Brighton Securities Corp has disclosed and may continue to share the collected categories of personal information noted above for the business purposes (also noted above) with our affiliates, our vendors and service providers, and third parties (e.g. attorney, accountant, etc.) to whom you or your agents (e.g. power of attorney, trustees, etc.) authorize us to disclose personal information in connection with products or services we (or they) provide you with.

*Non-affiliated third parties are contractually obligated to keep the information that we provide to them confidential and to use the information only to provide the services for which they were retained.

Your Rights and Choices

Right to Know/Access

Under CCPA, and subject to certain exemptions, California residents have the (1) right to know what personal information is being collected about them, (2) right to know whether their personal information is sold or disclosed and to whom and (3) right to access their personal information.

Right to Delete Personal Information

Under the CCPA, and subject to certain exemptions, California residents have the right to request deletion of their personal information that Brighton Securities Corp. is not required to maintain under Federal Securities Laws or otherwise.

Right to Object to Sale of Personal Information

Brighton Securities Corp. has not sold any personal information and does not intend to sell such information in the future. This includes personal information of minors under 16 years of age.

Exercising Access, Data Portability and Deletion Rights

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by either calling us at 585-473-3590 or emailing us at disclosures@brightonsecurities.com.

Response Timing

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 calendar days), we will inform you of the reason and extension period in writing.