

FACTS

WHAT DOES *BRIGHTON SECURITIES DO WITH YOUR PERSONAL INFORMATION?

Why?	Brighton Securities is dedicated to protecting your personal information. Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.						
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <table><tr><td>Social Security Number</td><td>Income Address</td><td>Account Balances and Transaction History</td></tr><tr><td></td><td>Occupation</td><td>Investment Objectives</td></tr></table> When you are no longer our customer, we continue to share your information as described in this notice.	Social Security Number	Income Address	Account Balances and Transaction History		Occupation	Investment Objectives
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How?	All financial companies need to share customers' personal information to run their everyday business. Brighton Securities may disclose your personal information to affiliates to enable it and its affiliates to process transactions you request. We may also disclose information about you and your account to third parties, as permitted by law, including custodians and other companies used to provide services to you. Such third-party service providers are subject to the laws of the jurisdiction in which they reside and may share information with their affiliates, subsidiaries and other third parties exclusively to provide the services for which they were retained or as otherwise permitted under applicable law. From time to time, we may be required to give information about our business to regulatory authorities. This may include your personal information. We do not sell your personal information to anyone. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Brighton chooses to share; and whether you can limit this sharing.						

Reasons we can share your personal information	Does Brighton share?	Can you limit this sharing?
For our 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	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We Do Not Share
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We Do Not Share
For our affiliates to market to you	No	We Do Not Share
For nonaffiliates to market to you	No	We Do Not Share

Questions?	Call 585-473-3590 or go to www.brightonsecurities.com
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Who we are

Who is providing this notice? *Brighton Securities. Brighton Securities refers to Brighton Securities Corp., Brighton Securities Holdings, Inc. and Brighton Securities Tax Services, Inc.

What we do

How does Brighton protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Brighton Securities maintains physical, electronic, and procedural safeguards to protect nonpublic personal information.

How does Brighton collect my personal information? We collect your personal information, for example, when you

- open an account or enter into an investment advisory contract
- give us your contact information, tell us about your investment or retirement portfolio

We also collect your personal information from others, such as affiliates, credit bureaus, or other companies.

Why can't I limit all sharing? Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions

Affiliates Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Brighton Securities Tax Services, Inc.*
- *Brighton Securities Holdings, Inc.*

Nonaffiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Brighton Securities Corp. may share information about you with non-affiliated third-party service providers that perform marketing or other services on our behalf.*

Joint marketing A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Brighton Securities Corp. doesn't jointly market*

Other important information

Text Message Opt-Out: If you are receiving text message from us and wish to stop receiving them, simply respond with "STOP" to the number from which you received the message. Once we receive your message, you will not longer receive further text messages from us.

State Law: We follow state law where state law provides you with additional privacy protections.

Do Not Call Policy: This Privacy Notice constitutes Brighton Securities Corp.'s Do Not Call Policy under the Telephone Consumer Protection Act for all Consumers. Brighton Securities Corp. maintains an internal Do Not Call list. Do Not Call requests will be honored within 30 days and will be effective for at least five years from the date of request. To be placed on Brighton Securities Corp.'s Do Not Call list, call 585-473-3590.

We strive to maintain accurate information about you and your accounts. If you believe that our records contain inaccurate information about you, please call or write to us immediately. We will promptly update or correct any erroneous information under our control.

Brighton Securities Corp. will provide you with an amended notice of our privacy policy in the event of a material change, including a change that requires Brighton Securities Corp. to provide you with opt-out rights.