

Brighton Securities Capital Management Privacy Statement

Our Commitment to You

At Brighton Securities Capital Management (BSCM), we are committed to protecting the privacy and security of the information you share with us. You trust us with your personal and financial information, and we will honor that trust by handling your information carefully and sensibly. You can rely on us to protect your privacy and ensure the security of your information, as described in this Privacy Statement.

- We do not sell customer information to other companies for marketing purposes.
- We employ strict security standards and safeguards to protect your personal information and prevent fraud.
- We will continue to protect your privacy even if you are no longer a customer.

How We Secure Your Assets and Protect Your Information

Our information security program is clear and comprehensive. Our employees and service providers are responsible for ensuring that your information is secure at all times. For example:

- We continually enhance our security tools and processes to meet or exceed industry standards.
- We take steps to protect your identity and your accounts by asking you for information that only you should know when you contact us. We follow these procedures on the phone and over the Internet.
- We communicate regularly with our employees about their obligations to protect your information.

How We Protect Your Privacy Online

Protecting your personal information online is an essential part of our service to you. For example:

- We validate your identity through confidential access codes before we allow online access to your accounts.
- Our systems use technologies such as firewalls and encryption (scrambling of information) to protect your information from others.

How You Can Help Us Protect Your Information

You can help safeguard your personal information by taking a few simple precautions:

- Do not disclose your account information, personal identification numbers, passwords or code words to others.
- Never provide confidential information to unknown callers.
- When utilizing the Internet, be sure to use a secure browser and exit online applications as soon as you finish using them.
- Ensure your personal computer has current virus protection software, and never open e-mail from unknown sources.

If you believe you may be a victim of identity theft:

- Contact your Financial Adviser to place holds on your accounts.
- Contact the Social Security Administration's Fraud Hotline at 1-800-269-0271 to report fraudulent use of your personal identification information.
- Report the incident as quickly as possible to each of the credit reporting agencies:

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|-------------|----------------|
| Experian | 1-888-397-3742 |
| Equifax | 1-800-685-1111 |
| Trans Union | 1-800-916-8800 |
- File a complaint with the Federal Trade Commission (FTC) by contacting the FTC's Identity Theft Hotline: 1-877-IDTHEFT.

How We Gather Information to Understand Your Financial Needs

In order to serve you, we become stewards of information about you. This information helps us to better understand your financial needs and provide more personalized, efficient service to you.

The information we gather comes from a variety of sources, including:

- Information you provide directly to us on applications or otherwise (such as Social Security Number and address)
- Information related to your transactions with the broker-dealer associated with your account, including Brighton Securities Corp., and their custodian (if different).
- Information we obtain from others at your request (such as information about assets held at another institution for inclusion in a financial plan)
- Information we obtain from others at your request (such as information about assets held at another institution for inclusion in a financial plan)
- Information obtained when you use online (Internet) products and services (such as transaction information)

We carefully manage the information gathered about you as described in the following section.

How We Manage Information to Serve Your Needs

Other than the limited exceptions below, we do not provide Customer Information to any third party. You do not need to request this confidentiality: it is our standard practice. In order to serve your needs, we may provide your information:

- To prevent fraud;
- To comply with a legally permitted inquiry by a government agency or regulator;
- To specialists that perform business operations for us (such as statement and letter mailings);
- To companies whose shares you own so they may maintain accurate shareholder records;
- To select credit reporting agencies;
- When it is legally required (such as in response to a subpoena); or
- When otherwise permitted by law.

You may withdraw your consent at any time (subject to legal or contractual obligations and on providing us reasonable notice by contacting our Chief Compliance Officer. Please be aware that withdrawing your consent may prevent us from providing you with requested products or services.

Credit Reporting Agencies

If you believe we have reported inaccurate information about your account to any credit reporting agency, please let us know in writing. Be sure to include your complete name, current address, Social Security Number, telephone number, account, specific item of dispute and the reason you believe the information is wrong. Send your notice to: Brighton Securities Capital Management, 1703 Monroe Avenue, Rochester, NY 14618. We will investigate your concern and correct any inaccuracies we find. We will inform you of any actions we take.

We Strive to Maintain Accurate Information

We continually strive to maintain complete and accurate information about you and your accounts. If you ever believe that our records contain inaccurate or incomplete information about you, please let us know immediately. We will correct any inaccuracies as quickly as possible. We welcome the opportunity to answer additional questions you may have about this statement or the safeguarding and confidentiality of your information. Please visit our website at www.brightonsecurities.com, contact your Financial Adviser or write to us at Brighton Securities Capital Management, 1703 Monroe Avenue, Rochester, NY 14618.