



# PRIVACY NOTICE

## FACTS

WHAT DOES *GRATRY & COMPANY, LLC* DO WITH YOUR PERSONAL INFORMATION?

## WHY?

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:

- Social Security Number
- Assets
- Retirement Assets
- Transaction History
- Purchase History
- Account Balances
- Account Transaction

When you are *no longer* our customer, we continue to share your personal information as described in this notice.

## HOW?

All financial companies need to share your personal information to run their every day business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Gratry & Company, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Gratry & Company, LLC Share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> Such as to process your transactions, maintain your account(s), provide services you request, when you have specifically authorized us and directed us to do so, respond to court orders and legal investigations, when required by law, or when federal or state regulators examine our books and records	Yes	No
<b>For our marketing purposes –</b> To offer our products and services to you	No	We don't share
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our non-affiliates' everyday business purposes –</b> Information about your transactions and experiences	Yes	No
<b>For our non-affiliates' everyday business purposes –</b> Information about your creditworthiness	No	We don't share
<b>For non-affiliates to market to you</b>	No	We don't share

**QUESTIONS? Call 1-216-283-8423**

<b>Who we are</b>	
Who is providing this notice?	GRATRY & COMPANY, LLC
<b>What we do</b>	
How does Gratry & Company, LLC protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include physical, electronic and procedural safeguards.</p> <p>Our service providers are held accountable for adhering to strict policies and procedures to prevent any misuse of your non-public personal information.</p>
How does Gratry & Company, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>▪ Complete an Investment Advisory Agreement</li> <li>▪ Open an account</li> <li>▪ Provide account information, orally and in writing</li> <li>▪ Give us your contact information</li> <li>▪ Make deposits or withdrawals from your account</li> </ul> <p>We also collect your personal information from other companies such as brokerage firms, record keepers, outside managers and custodians about your transactions with us or with others.</p>
Why can't I limit all sharing?	<p>Federal Law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes – information about your credit worthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for non-affiliates to market to you</li> </ul> <p>State Laws and individual companies may give you additional rights to limit sharing</p>
<b>Definitions</b>	
Affiliates	<p>Companies related by common ownership or control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ Gratry &amp; Company, LLC does not have any affiliates.</li> </ul>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ Gratry &amp; Company, LLC does not share with non-affiliates so they can market to you.</li> </ul>
Joint Marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you</p> <ul style="list-style-type: none"> <li>▪ Gratry &amp; Company, LLC does not share with any joint marketing firms.</li> </ul>
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