

## Protection of Your Personal Financial Information (Grove Point Financial, LLC Privacy Policy)

Who We Are: Grove Point Financial, LLC ("Grove Point Financial") is the parent company of Grove Point Investments, LLC and Grove Point Advisors, LLC, a registered broker-dealer and registered investment adviser, respectively. Through our Financial Professionals (registered representatives with Grove Point Investments, LLC who also may be investment advisor representatives with Grove Point Advisors, LLC) we provide financial products and services to the general public. We are providing you with this privacy policy to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

Why We Collect Information: We collect and use information about you in order to provide you with our financial products and services. For example, we use your information to determine the suitability of our investment recommendations and to process transactions for your account.

What Information We Collect: The information we collect may include information such as your name, address, social security number, assets, income, net worth, investment experience, risk tolerance, investment objective, beneficiary designations and other information from your application.

How We Collect Information: We obtain most information directly from you when you open an account or purchase financial products or services from us. For example, we may collect your personal information directly from you when you seek financial advice or advice about your investments, direct us to buy or sell securities, provide employment information, or show us your government-issued ID. We may also obtain information about you from our Financial Professionals and their affiliated businesses, and from third parties such as retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies, your former broker-dealer or its registered representative, clearing firms, or others who provide you with financial products or services.

Information We Disclose: We may disclose information about you, as described above, to our staff, affiliates, representatives, their affiliated businesses, nonaffiliated third parties who provide you with financial products and services, and our service providers, such as a mailing company. These nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. Our privacy policy is the same for current, as well as former clients. Also, if you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your Financial Professional selects. If your Financial Professional servicing your account leaves us to join another broker-dealer, the Financial Professional may be permitted to retain copies of your information so that he or she can assist with the transfer of your account and continue to serve you at their new firm. The Financial Professional's continuing use of your information will be subject to the new firm's privacy policy. We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products and services or report on your account, or where disclosure is prescribed by law. For example, we report your tax-related information to federal and state governments, and we may disclose information during the course of an audit or to law enforcement or regulatory agencies. We do not disclose your information to nonaffiliated companies who intend to market their products to you. For example, we will not sell clients' names and addresses to a catalogue or marketing company.

"Opting-out" of Third-Party Disclosures: Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all information sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. We need to share personal information to provide services to you and run our everyday business. If the Financial Professional servicing your account(s) leaves to join another financial institution, the Financial Professional may retain copies of your personal information so that he or she can continue to serve you at their new firm. In doing so, your Financial Professional may share your information with the new firm for purposes of establishing an account with that firm, but is otherwise required to keep confidential the personal information obtained from you while the Financial Professional was affiliated with Grove Point Financial, and he or she may use your information only to service your account(s). If you wish to limit this sharing please contact our Compliance Department at 301-944-5900.

**Securing Your Information:** Our staff, affiliates, and Financial Professionals who have access to your information are required to follow our procedures reasonably designed to keep your information secure and confidential. Our physical, electronic, and procedural safeguards have been reasonably designed to protect your information.

**Other Applicable Laws:** The practices described are in accordance with Federal Law. We also follow privacy requirements under applicable state law. If a state's privacy laws are more restrictive than those stated in this policy, we comply with those laws.

**Questions:** If you have questions about our privacy policy, you may contact your local Grove Point Financial Financial Professional, you may visit the Investor section of our website <u>(www.grovepointfinancial.com)</u>, or you may contact us at: Grove Point Financial, Attn: Compliance Department, 2440 Research Blvd, Suite 500, Rockville, MD 20850.

## **SIPC Information**

Investor information about the Securities Investor Protection Corporation (SIPC) may be obtained at their website (<a href="https://www.sipc.org">www.sipc.org</a>) or by contacting SIPC at 202-371-8300 to request a SIPC brochure.

## **FINRA Information**

Investor information may be obtained at the FINRA website (<u>www.finra.orq</u>) or by contacting FINRA at 301-590-6500. For information regarding FINRA BrokerCheck, a free tool to help investors research the professional backgrounds of current and former FINRA-registered brokerage firms and brokers, please visit <u>www.finra.orq/BrokerCheck</u>, or call the FINRA BrokerCheck Help Line at 800-289-9999.