



**GROWTH
CAPITAL
SERVICES**

Member of FINRA and SIPC

Privacy Policy

We Respect Your Privacy

Growth Capital Services places a high value on the trust and confidence our customers place in us. Today's technology allows for broad and deep sharing of information, so it is important that we have put in place safeguards and policies to protect your information.

Collection of Information

We collect only the information we need to serve you and administer our business. We are committed to keeping your information confidential and we place strict limits and controls on the use and sharing of your information. We make every effort to ensure the accuracy of your information. We collect, retain and use client information to aid in providing you with suitable investment recommendations and high quality customer service. This information comes to us from a variety of sources. It can include information you provide on applications or forms such as name, address, social security number, date of birth, income, net worth, and information about account transactions (such as purchases, sales and account balances). The information could be received while you are a client of our firm and/or could have been collected by your advisor prior to joining our firm.

We Place Strict Limits and Controls on the Use and Sharing of Your Information

We do not disclose any non-public personal information about you or former clients to anyone, except as permitted by law and as set forth in this document. Specifically, so that our firm may continue to offer products and services that meet your investing needs, and to effect transactions that you request, we may disclose information to our employees, affiliates, registered representatives and their affiliated businesses, companies that perform administrative or marketing services on our behalf, and reporting and regulatory agencies (pursuant to Anti-Money Laundering requirements). As stated in our agreements with these companies, they will only use non-public information for the services for which we have specified, and are not permitted to use or share this information for any other purpose. These firms are required to have policies and procedures to protect your confidential information.

Access to your information will be provided only to authorized affiliates; employees; vendors including those permitted by law in order to prevent fraud, control risk, resolve complaints or



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as otherwise required by law; credit reporting agencies; registered associates; and staff members who require the information to facilitate and administer your business. We maintain (and require these authorized parties to maintain) physical, electronic and procedural safeguards that comply with federal and state standards to protect this information. If the representative serving your account(s) leaves our firm to join another firm, he or she may retain copies of your personal information to continue to service you at the new firm, but is otherwise required to keep confidential the personal information obtained from you while affiliated with us. Under no circumstances do we sell this information to any person or entity. If you decide at some point to close your account or become an inactive client, we will continue to adhere to the privacy policies and practices described in this notice.