



## PRIVACY POLICY

# Courtlandt

The "Courtlandt" family of companies includes: Courtlandt Securities Corporation, a registered broker-dealer and FINRA / SIPC member firm; Courtlandt Insurance Services, a Licensed Insurance Agency; Courtlandt Realty, a California Real Estate Broker; and courtlandt1031.com

Your relationship with Courtlandt is based on trust and confidence. To fulfill its responsibilities to you, Courtlandt requires that you provide current and accurate financial and personal information. Courtlandt will protect the information you have provided in a manner that is safe, secure and professional. Courtlandt and its employees are committed to protecting your privacy and to safeguarding that information. This privacy policy also applies solely to information collected by website. It will notify you of the following:

1. What personally identifiable information is collected from you through the web site, how it is used and with whom it may be shared.
2. What choices are available to you regarding the use of your data.
3. The security procedures in place to protect the misuse of your information.
4. How you can correct any inaccuracies in the information.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to ship an order. Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy

### **Categories of Information We Collect, Use and Share**

Courtlandt collects nonpublic information from the following sources:

- Information we receive from you or those you authorize on applications or other forms (such as your name, address, phone number, social security number, occupation, assets, income, and other financial and family information);
- Information relating to your transactions with us or with others (such as account numbers, holdings, balances, transaction history and other financial and investment activities);
- Information that may be received from other sources with your consent or with the consent of your introducing broker.

### **Sharing Nonpublic Personal and Financial Information**

Courtlandt is committed to the protection and privacy of its customers' and consumers' personal and financial information. Courtlandt will not share such information with any nonaffiliated third party except as permitted by law, such as:

- When necessary to complete a transaction in the account, such as with the clearing firm or account custodians
- When required to maintain or service the account, such as executing transactions or providing products and services
- To resolve customer disputes
- When requested by a fiduciary or beneficiary on the account
- To our attorneys or accountants



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- When required by a regulatory agency, or for other reasons required or permitted by law
- In connection with a sale or merger of any of Courtlandt's entities
- In any circumstance that has the customer's instruction or consent.

#### **We Will Take the Following Steps If a Determination is Made That Our Customer Data Has Been Compromised:**

- Document the incident(s)
- Verify the incident(s) as to what data was compromised
- Notify all customers affected via e-mail of what data is believed to be compromised and how to monitor their credit report
- Notify authorities if applicable

#### **Your Access to and Control Over Information**

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the email address or phone number given on our website:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

#### **Registration**

In order to use some features of this website, a user must first complete the registration form. During registration a user is required to give certain information (such as name and email address). This information is used to contact you about the products/services on our site in which you have expressed interest. At your option, you may also provide demographic information (such as gender or age) about yourself, but it is not required.

#### **Protection of Personal Information**

Courtlandt prohibits the disclosure of your nonpublic personal information by all of our representatives, affiliates and third party service providers except as required or permitted by law. Furthermore, Courtlandt restricts access to your personal and account information to those representatives who need to know that information to provide products or services to you. Courtlandt maintains physical, electronic, and procedural safeguards to guard your nonpublic personal information. Additionally, should a client decide to close their account(s) or become an inactive customer, we will adhere to the privacy policies described in this notice.

Courtlandt reserves the right to make changes to this policy. For more information relating to Courtlandt's privacy policy, please contact us at the numbers or address below.

Courtlandt Securities Corporation  
Attn: Compliance Department  
P.O. Box 11929  
Newport Beach, CA 92658  
949-251-6901 (Phone)  
949-251-6911 (Fax)