

## **BROOKSTONE CAPITAL MANAGEMENT LLC PRIVACY POLICY**

At Brookstone Capital Management LLC (BCM) your trust is our top priority. The confidentiality of your personal financial information is of paramount importance to all of us, and we will remain vigilant in protecting your privacy. We are sending you this privacy notice to help you understand how we use your private financial information, and to let you know what we do to help protect your privacy.

### **What Information Do We Collect From You and About You?**

To serve your client needs, BCM collects information from you and about you. Some of this information is collected to satisfy certain legal and regulatory requirements, while other information is collected so that we can service your account effectively. Examples of the information that we collect includes:

- Information from your account application and other forms, such as name, address, Social Security number, telephone number, employment information, income, net worth, investment experience, and other information to service your account effectively. We may also collect information from consumer reporting agencies
- Information about your financial transactions, including securities purchased and sold, fund transfers, account balances, and other account activities.

### **To Whom Do We Disclose Your Information?**

BCM does not sell your personal financial information to anyone. However, we do disclose your personal information to third parties or outside companies that help us process your transactions or service your account. One such company is the clearing firm which processes your transactions and acts as the account custodian. We may also provide information to outside service providers that help administer your accounts. Any outside company or third party provider must limit their use of your information to the purpose for which it was provided.

BCM may also provide your personal information when permitted or required by law or regulation. Examples include providing information in response to a subpoena or court order, to cooperate with regulators, governmental authorities or law enforcement authorities, or in response to a request from a consumer reporting agency.

Outside of these circumstances, we will not provide your personal information to third parties unless you have specifically asked us to do so.

### **What Do We Do To Protect Your Personal Information?**

We restrict access of your personal financial information to personnel who require that information to service your business. All employees are trained regarding the policies and procedures encompassed by this privacy policy. We maintain physical, electronics and procedural safeguards to guard your personal information. This privacy policy applies to all of our current and former clients. If in the future this privacy policy needs to change for any reason, we will provide you with written notification of the change, allowing you the opportunity to opt-out.

If you wish to receive the latest BCM Form ADV Part II, or for any questions regarding BCM's privacy policy, please call us at (866) 425-3003.

## **Additional Information for California Residents**

### **THE CCPA**

The California Consumer Privacy Act ("CCPA") is a sweeping piece of legislation that grants California residents increased control over their personal data.

The CCPA allows consumers to find out what personal information of theirs has been gathered, to request that businesses delete their data, to opt out of having their information sold, and more. It requires affected companies to create processes to comply with and facilitate consumer data requests, to update their privacy policies, and to assure that their vendors comply as well.

This privacy notice provides the details you need to understand your rights under the CCPA, and to exercise those rights. It provides you with the contact information you need to take action regarding the privacy of your data.

### **YOUR PII RIGHTS**

The CCPA provides you with certain rights in regard to what we do with your personally identifiable information ("PII"). This section details those rights, how to exercise them, and what BCM will do in response.

### **DISCLOSURE**

You have the right to request that we disclose to you, free of charge, the categories and specifics of the PII we collect about you and/or, otherwise disclose about you to a third party for business purposes. We require a verifiable request from you to ensure that it is, in fact, you who is requesting such a PII disclosure. Once we verify the request, we will provide that information to you.

Your request for disclosure can apply to any PII we collect about you for as long as twelve months preceding your request. We are not required to disclose information about the PII we collect about you more than twice in a twelve-month period.

Following our verification of your request, we will disclose to you, unless otherwise restricted by law or regulation, the following PII we collect about you:

1. The categories of personal information we have collected about you
2. The categories of sources from which the personal information is collected
3. The business or commercial purpose for collecting or selling that personal information
4. The categories of third parties with whom we share personal information
5. The specific pieces of personal information we have collected about you

Following our verification of your request, we will disclose to you, unless otherwise restricted by law or regulation, the following PII about you that we sell to a third party or otherwise disclose for business purposes:

1. The categories of personal information we have collected about you that we disclose

2. The categories of sources from which that personal information is collected
3. The business purpose for collecting, and/or disclosing that personal information

## OPTING OUT

BCM does not sell client information to third parties at the current time. Should this change in the future, BCM would adopt policies and procedures to comply with legal and regulatory requirements, including providing the ability to opt-out of these practices.

## DELETION OF PII

You have the right to request that we delete PII we have collected from you. Following our verification of your request, we will comply with your request and delete any or all of your PII in our possession that we collected from you and/or any or all such PII in the possession of our service providers, unless otherwise restricted by law or regulation. Specifically, BCM may be limited in its ability to delete certain PII since, as an SEC-registered investment adviser, it is required by securities BCM is not required to maintain certain PII, it will honor requests for deletion of such information.

## NON-DISCRIMINATION FOR EXERCISING YOUR PII RIGHTS

We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this privacy notice.

## CONTACTING US TO EXERCISE YOUR PII RIGHTS

You may contact us in order to exercise any of your rights set forth in this privacy notice by calling this toll-free number, 1-(866) 425-3003, emailing us at [compliance@brookstonecm.com](mailto:compliance@brookstonecm.com), or visiting our website <https://www.brookstonecm.com/>.