

## PRIVACY POLICY

Aequitas Investment Advisors LLC, an independent investment planning and management firm, is committed to safeguarding the confidential information of our clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Aequitas Investment Advisors. We never disclose information to unaffiliated third parties, except after receiving your expressed permission, or as required by law, and have no intentions of doing so in the future. As you know, we use financial information that you provide to us to help you meet your personal investment objectives while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- The categories of nonpublic personal information that we collect from a client depend upon the scope of the advisory agreement. It will include information about your personal objectives, your goals and life aspirations. It will also include information about your family, your finances, your employment and/or business, and information about your health (to the extent it is relevant to the planning process). It may also include information about transactions between you and third parties.
- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to unaffiliated parties as required or permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted or required by law.
- We do not provide any of your personal information to mailing list vendors or solicitors and never intend to do so.
- Personally identifiable information about you will be maintained during the time you are a client and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

If, at any time in the future, it is necessary to disclose any of your information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

## **ANNUAL FORM ADV NOTICE**

January 2016

As a Registered Investment Advisor, the Investment Advisors Act of 1940 Rule 204-3 requires each year that we offer a written disclosure statement containing certain specified information concerning our backgrounds and business practices. You were given a prior copy when we first began working together and an updated version in plain English in May 2011. If you would like a current copy of Part 2A of Form ADV as filed with the Commonwealth of Massachusetts Securities Division, please let us know and we will be happy to mail one to you. Further, as a service to current and potential clients, the Securities Division maintains records regarding each registered investment advisor, including any disciplinary history. You may obtain such information by calling them at (617) 727-3548.