



## Annual Privacy Statement (2020)

### Background

Personal financial planning, investment planning, wealth management, and other similar type professional relationships that prospects and clients (hereinafter referred to as “You” or “Your”) have with Caratel Financial Services, Inc. (hereinafter referred to as “Caratel,” “We,” or “Us”) involve the disclosure of highly confidential information concerning personal relationships, assets and liabilities, as well as income. We are continually aware of the need to keep confidential all information about you, including your identity. We understand that, you, as a prospect or client, expect that your affairs shall remain confidential and it is an affirmative duty upon all employees of Caratel that those goals of complete confidentiality be fully met to the best of our ability.

All reasonable steps will be taken to insure that confidential information be kept private and confidential. No disclosure of information shall be made to anyone within the office to whom such disclosure is not necessary for the purpose of accomplishing the work requested. It is prohibited to discuss any of your information with anyone not authorized outside of the office, including spouses, family or social friends.

Confidentiality includes your identity. There is no disclosure of your identity or the nature of your business with Caratel, or of any information regarding your assets, liabilities, income, or estate planning details.

### Regulations

Employees of Caratel are committed to the provisions of the Gramm-Leach-Bliley Act (the “Privacy Act”) passed in November 1999. The Privacy Act specifically identifies three groups of individuals: non-consumers, consumers, and customers.

Caratel is aware of the Federal Trade Commission rule requiring financial institutions, including state-registered investment advisers, to ensure the security and confidentiality of client data, effective May 23, 2003.

Caratel is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

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The categories of nonpublic information that we collect from you may include information about your family and relatives, personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, or other professionals with whom you have established a relationship. **You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person.** With your permission, we share a limited amount of information about you with our Custodian firm and Platform Provider (as such terms are used in the Client Agreement) in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier; secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to offer deliver of this *Privacy Statement* to you annually, in writing.

As always, should you have any questions regarding this Privacy Statement of any other matter do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Barry G. Katz', is written over a light blue horizontal line.

Barry G. Katz, MBA, CFP®  
President