



Privacy Policy

(As of 12/12/2023)

Grey Capital Management, LLC recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Grey Capital Management, LLC will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. Grey Capital Management, LLC will provide this privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning-related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties concerning your financial profile.

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our clearing firm or independent contractors hired by Grey Capital Management, LLC. If the Financial Advisor leaves Grey Capital Management, LLC to join another firm, he or she may be permitted to retain copies of client information so that they can assist with the transfer of client accounts and continue to serve the client at their new firm.

“Opting-Out” of Third-Party Disclosures: If you do not want your Financial Advisor to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact us by calling (716) 397-8886.



Otherwise, Grey Capital Management, LLC will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient.

Arrangements with companies or independent contractors not affiliated with Grey Capital Management, LLC will be subject to confidentiality agreements.

How We Protect Your Personal Information

Privacy has always been important to Grey Capital Management, LLC. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.