

## **Privacy Policy and Notice**

At Catalyst Financial Partners, LLC (“CFP,” “we,” “us” or “our”), we respect your personal privacy. We realize that you have entrusted us with private personal and financial information, and it is important that you know our policy concerning what we do with that information.

It is CFP’s policy that all sensitive and non-public information of or about our clients (hereinafter “Client Information”) shall remain confidential. This includes disclosures of information to family members, friends, and other clients, unless express permission to disclose such information is given to CFP by the client directly.

This “Privacy Notice” describes how we collect, store, use, disclose and protect your personal information that may, directly or indirectly, identify you during and after your working relationship with us and/or through our “Website.” We use the term “personal information” to describe information that can be associated with you and can be used to identify you. Personal information does not include information that does not identify a specific person or that is publicly available. In particular, this Privacy Notice describes the basis upon which, and for what purposes, we process your personal information, how we share your personal information, and how we protect and safeguard your personal information.

CFP does not sell Client Information to anyone.

CFP will only share Client Information with non-affiliated third parties, as stated in this Policy or as permitted by law, unless CFP provides you with an additional notice or obtains your permission.

By working with us and using our Website, you agree to the terms and conditions of this Privacy Notice as more fully described below.

The Client Information we share is for business purposes only. This may include any of the categories of personal information identified in this Privacy Notice that we may collect. Client Information includes any information obtained from any client from account applications and other forms submitted to CFP, as well as personal information we may collect from a client’s transactions and experiences with CFP, or from others relating to the products and services we provide.

CFP representatives/advisors may be registered representatives of registered broker-dealers that are not affiliated with CFP and CFP may have relationships with other non-affiliated investment advisor firms, insurance companies, trust companies, custodians, other financial services firms, accountants and law firms. Except in connection with providing services under an Engagement Letter with CFP, or as permitted under this Policy or as permitted by law, CFP does not share Client Information with non-affiliated parties without your permission or direction.

If your representative/advisor’s affiliation with CFP ends and he/she joins a non-affiliated registered investment advisor, or securities broker-dealer, your representative/advisor may be

permitted to use limited Client Information to contact you upon joining the new firm, as a usual means to continue to service and maintain your accounts. The Client Information they may use is limited to your name, address, email address, phone number and account title.

The safeguarding of Client Information is an issue taken seriously at CFP. To affirm our continuing commitment to the proper use of Client Information, we have set forth the following Privacy Policy. This Privacy Policy guides CFP and its representatives in serving the privacy needs of our clients.

1. **Recognition of a Client's Expectation of Privacy:** At CFP, we believe the confidentiality and protection of Client Information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our Clients' trust. Thus, the safekeeping of Client Information is a priority for CFP.
2. **Client Information Collected:** CFP collects and uses various types of information to service your accounts, to save you time and effort and to better understand your needs and your investment goals and objectives. The Client Information we collect and store generally consists of the following:
  - A. Information gathered from applications, investment policy statements and questionnaires, forms, and other information you provide to CFP, in person, by telephone, electronically or by other means, which include but is not limited to your name, address, birth date, social security numbers, assets, income, debt, spending habits, investment objectives, account numbers and financial goals.
  - B. Information about your transactions and your account experience with CFP, such as your account balances, trading activity, payment history and parties to transactions and investments.
  - C. Information such as employment, insurance, tax and legal planning, together with information concerning retirement plans, wills, trusts, mortgages, tax returns and employee benefits.
  - D. Any other information that may be obtained from other relationships that our clients may have with other professionals and providers such as accountants, attorneys, insurance agents, bankers, etc.
3. **Managing Client Information:** The information we share within CFP helps us provide you with better service and more options. CFP restricts access to Client information to those employees, agents, or other parties that need to know the information to provide services to you. We will only disclose Client Information that we collect in accordance with this policy. From time-to-time, however, CFP may be obliged to share Client Information to comply with reporting and other legal requirements.

#### Sharing Information within CFP

CFP may share Client Information within the company and between company representatives and employees, as necessary to properly service your account(s).

### Sharing Information with Companies that Work With CFP

CFP may share Client Information with unaffiliated third parties who perform services for CFP and its clients, or in connection with the servicing or processing of accounts, and products and services provided to clients. These companies may include other financial service providers such as custodians, broker/dealers, outside managers, transfer agents, operations personnel and the like. These companies may assist us in fulfilling your service requests, processing your transactions, handling electronic transmission of information including emails, transmitting your account statements, etc.

### Sharing Information with Other Advisors

Except in connection with providing services under an Engagement Letter with CFP, or as permitted under this Policy or as permitted by applicable law or rules of self-regulatory organizations, CFP does not share Client Information with non-affiliated parties without your permission or direction. If your representative/advisor's affiliation with CFP ends and he/she joins a non-affiliated registered investment advisor, or securities broker-dealer, your representative/advisor may be permitted to use limited Client Information to contact you upon joining the new firm, as a usual means to continue to service and maintain your accounts. The Client Information they may use is limited to your name, address, email address, phone number and account title. Some states require us to get your affirmative consent to share information with unaffiliated third parties. If you live in one of these states, and your representative gives us notice of an anticipated change in brokerage firms, we will contact you with instructions on how you can give your consent. Once you give us your consent, you can withdraw it at any time by calling 617-239-8101. Your representative's continued use of your transferred information will be subject to the new firm's privacy policy.

4. **Maintenance of Accurate Information:** CFP recognizes that it must maintain accurate client records. Therefore, CFP has established procedures to maintain the accuracy of Client Information and to keep such Information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner. If your Client Information is ever inaccurate, incomplete or in need of updating, please contact us and we will update your information as soon as possible. If you have questions or believe your Client Information has not been handled properly, you may always contact CFP and we will provide an answer or investigate your concerns and report to you the findings of our investigation. See paragraph 13 regarding "*How To Contact Us*" below.
5. **Limiting Employee Access to Information:** At CFP, employee access to personally identifiable Client Information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of Client Information and on this Privacy Policy. Because of the importance of these issues, all CFP employees are responsible for maintaining the confidentiality of Client Information and employees who violate this Privacy Policy will be subject to disciplinary measures.
6. **Maintaining Client Privacy in Business Relationships with Third Parties:** If CFP provides personally identifiable Client Information to a third party with which we have a business relationship, CFP insists that the third party keep such Information confidential, consistent with the conduct of our business relationship.

**7. How Long Client Information is Kept:** We will keep your personal information while you have an account with us or while we are providing investment advisory services to you.

Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Notice. Different retention periods apply for different types of personal information.

**8. Information Security Control:** Within the firm, we employ numerous safeguards to ensure the security and confidentiality of all Client Information. We restrict access to your personal financial information to the employees who need to know that information to provide services to you. We maintain physical, electronic, and procedural safeguards to protect your privacy including daily backups of our computer information in a secure environment, anti-virus protection software, hard drive encryption software, and password protected access to client information. Additionally, we employ an email encryption service to securely send and request email attachments.

CFP has also adopted the following policies in order to safeguard the personal information of our clients in accordance with applicable law:

1. CFP is committed to protecting the confidentiality and security of the Client Information it collects and will handle nonpublic personal information about clients only in accordance with all applicable laws, rules and regulations. We shall ensure: (a) the security and confidentiality of client records and information; (b) that client records and information are protected from any anticipated threats and hazards; and (c) that unauthorized access to, or use of, client records or information is protected against. These security measures include computer safeguards and secured files and buildings.
2. CFP will maintain policies and procedures that are reasonably designed to safeguard nonpublic personal information about clients and only permit appropriate and authorized access to, and use of, nonpublic personal information about clients through the application of appropriate administrative, technical, and physical protections.
3. To the extent required by applicable law, we shall direct each of our service providers to adhere to the CFP's Privacy Policies with respect to all nonpublic Client Information about provided to such service providers.
4. CFP shall not disclose any nonpublic personal information about its clients or former clients to anyone, except as permitted or required by law.
5. CFP shall issue notices of its Privacy Notice to its clients initially and on an annual basis thereafter to the extent required by applicable law.

By disclosing your personal information to CFP, you consent to the collection, storage, and processing of this information by us in a manner consistent with this Privacy Policy and Notice.

**8. Keeping Up To Date with CFP's Privacy Policy and Notice:** CFP reserves the right to make changes to this Privacy Policy and Notice. You can always contact us and request the current version of our Privacy Policy and Notice. Your continued use of our Website and our services following any changes means that you accept the revised Privacy Policy and Notice.

**9. Former Clients:** Even if you are no longer a client of CFP, this Privacy Policy and Notice will continue to apply to you.

**10. Linking to Other Websites:** We may provide links to third party websites. If you follow links to third-party websites not affiliated or controlled by CFP, you should review that third-party's privacy and security policies and other terms and conditions, as they may be different from our Privacy Policies and Notice. We do not guarantee and are not responsible for the privacy or security of these third-party websites, including the accuracy, completeness, or reliability of their information.

**11. Children's Privacy Online:** We respect the privacy of children and encourage parents to supervise their children's computer usage. Our Website is not directed or intended for individuals under the age of thirteen (13), and we request that these individuals do not provide personal information through the Website. We do not knowingly collect or retain information from children under the age of 13 without parental consent. Visit the [Federal Trade Commission](#) website for more information about the Children's Online Privacy Protection Act (COPPA).

**12. Your Choices about Certain Uses and Disclosures of Client Information:** The Gramm Leach Bliley Act of 1999, as may be amended from time-to-time, requires that CFP give you the option to prohibit disclosure of your Client Information to non-affiliated third parties for marketing purposes if CFP were to make such disclosures. This is referred to as your "opt-out" right. However, since CFP only discloses such information for such purposes with your consent, it is not necessary for CFP to provide you with an "opt-out" opportunity as it has already been exercised for you. If you want your Client Information to be disclosed for marketing purposes, you must either give us instructions to do so, or send us a written consent signed by you directing us to make such disclosures.

**13. How To Contact Us:** Please contact us by USPS, email or telephone if you have any questions about this Privacy Notice, what information we collect about you, how we share your personal information or how we safeguard your personal information.

Our contact details are shown below:

Daniel Ronan, Chief Compliance Officer, Catalyst Financial Partners LLC, One Marina Park Drive, 16<sup>th</sup> Floor, Boston, MA 02210, 617-239-8101 or [dan@catalystfp.com](mailto:dan@catalystfp.com).

*This Privacy Policy applies to individuals, and we reserve the right to change this Privacy Policy, and any of the policies or procedures described above, at any time without prior notice. If CFP does change its Privacy Policy, we will notify our clients.*