

# Privacy Policy

Chicago Capital Management Advisors, LLC. ("CCMA") is committed to protecting your personal customer information. We want you to understand how we protect your private information when we collect and use private information about you. This Privacy Policy informs you how to opt-out if you do not want CCMA to share information about you with others.

We have created our Privacy Policy to communicate our privacy commitment to you.

\* It is CCMA' policy not to sell personal information to third parties for payment or any other compensation;

\* We will at all times maintain physical, electronic and procedural safeguards to protect customer/personal information we obtain;

\* We will inform customers of our Privacy Policy at the time an account is opened, annually thereafter and again when such policy changes along with what changes were made;

\* We will shred any paper documents and reports generated that contain your personal non-public information when such documents are not needed and we are disposing of them.

## **In order to provide you with products and services you have requested for your securities brokerage account, CCMA may receive nonpublic information about you from the following:**

Account forms which may include information including, but not limited to, name, address, phone number, social security number, birth date, driver's license number, income, net worth, bank reference, employment, investment objectives and investment experience; Copies of trusts, profit sharing or other qualified plans, articles of incorporation or formation, estate planning documents; Transaction activity in your account(s) or outside companies such as mutual fund and insurance companies; Credit reporting agencies for verification of accuracy of application data and/or to access credit worthiness for credit products; From other sources, with your consent, for example transferring your account to CCMA; From other companies to assist us in marketing our products and services we offer jointly with other financial companies, for example mutual fund companies and insurance companies.

We may disclose personal information about you to our staff, affiliates, representatives and third parties who provide you with financial products and services. We do not disclose personal information that we collect about you to non-affiliated third parties except for securities vendors needed to serve your securities brokerage needs according to industry standards and practices, your registered representative(s) or others as further described below, or when required to do so by law

Nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. We do not disclose personal information about you to non-affiliated companies who intend to market their products to you. For example, we will not sell your name and address to a catalogue or marketing company.

When we share personal information about you with these companies, we request that they limit their use of it to the particular purpose for which it was shared, and they are asked not to share it with others except to fulfill that limited purpose.

If you wish to opt out of our sharing non-public personal information with any non-affiliated third parties (except as required by law or applicable regulatory or industry standards or practices), please inform us either by writing to us at the address below or calling us at (219) 473-5542.

## How your information is protected

CCMA is committed to protecting your non-public information and considers the safeguarding of such information a priority. We maintain procedures and technology designed to prevent access to your personal information. We employ physical, electronic, and procedural protections in accordance with industry standards.

We restrict access to personal information to employees, our Adviser Representatives and service providers for legitimate business purposes. We may share personal information we collect about our customers, prospects and former customers to service providers such as:

- \* Unaffiliated service providers such as securities clearing houses, printers for delivery of statements and other administrative services associated with your account(s).
- \* Government agencies, such as tax reporting or court orders.
- \* Other organizations such as consumer reporting agencies.
- \* Other organizations, as permitted by law that protect your privacy such as fraud prevention.
- \* Our Adviser Representative(s) who may be independent correspondents of CCMA.

## Use of Information by Your Adviser Representative

We know that for many of our customers, their ongoing relationship with their Adviser Representative is of major importance. Therefore, we permit our Adviser Representatives to maintain their own customer databases and files. These files may contain some or all of the same information, confidential or otherwise, we possess about you. We further permit our Adviser Representatives to use this information in servicing your account(s) and to take this information with them and share it with a new, unaffiliated broker-dealer or registered advisory firm, should your Adviser Representative end his/her registration/affiliation with CCMA. We do this to enable former Adviser Representatives to provide continued, uninterrupted service to you, our customer, should you desire to transfer your accounts to a new broker-dealer. If you wish to opt out of this information sharing arrangement with our Adviser Representatives, please inform us either by writing to us at the address below or calling us at (630) 241-1122. If your primary address is in a state (such as Vermont or California) that requires your affirmative consent to share your personal confidential information, we will automatically opt you out of sharing your information unless you have provided us with written authorization to opt you in to such sharing.

This Privacy Policy shall apply to current as well as former clients.

For More Information Please Contact:

630-241-1122