



## Privacy Policy

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our clients are confident that we will manage their financial affairs expertly and confidentially.

We want to assure all of our clients that whenever information is used, it is done with discretion. The safeguarding of client information is an issue we take seriously at Sarasota Capital Strategies, Inc. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our clients.

- 1. Recognition of a Client's Expectation of Privacy:** At Sarasota Capital Strategies, Inc., 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 Sarasota Capital Strategies.
- 2. Use, Collection, and Retention of Client Information:** Sarasota Capital Strategies limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth.
- 3. Maintenance of Accurate Information:** Sarasota Capital Strategies recognizes that it must maintain accurate client records. Therefore, Sarasota Capital Strategies 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.
- 4. Limiting Staff Access to Information:** At Sarasota Capital Strategies staff member access to personally identifiable client information is limited to those with a business reason to know such information. Staff members are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Sarasota Capital Strategies staff members are responsible for maintaining the confidentiality of client information and staff members who violate these Privacy Principles will be subject to disciplinary measures.
- 5. Protection of Information via Established Security Procedures:** Sarasota Capital Strategies recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, Sarasota Capital Strategies has established appropriate security standards and procedures to guard against any unauthorized access to client information.
- 6. Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Sarasota Capital Strategies places strict limits on who receives specific information about client accounts and other personally identifiable data. Sarasota Capital Strategies may share information if Sarasota Capital Strategies is: (a.) previously authorized to disclose the information to individuals and/or entities not affiliated with Sarasota Capital Strategies, including, but not limited to the client's other professional advisors and/or service providers; (b.) required to do so by judicial or regulatory process; or (c.) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy.

We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our clients; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a client.

- 7. Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
- 8. Disclosure of Privacy Principles to Clients:** Sarasota Capital Strategies recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles, which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should contact us at **(941) 918-2255**.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.

460 South Tamiami Trail  
Osprey, FL 34229  
(941) 918-2255  
service@etfpros.com