

CALTON

Privacy Policy & MSRB Investor Information

CALTON
2701 N. Rocky Point Drive, Suite 1000
Tampa, FL 33607

Privacy Policy & MSRB Investor Information

Preserving trust is a core value. We recognize that you expect us to protect the information you provide us and to use it responsibly. We are strongly committed to fulfilling the trust that is the foundation of your expectations. For that reason, we have adopted and adhere to the following policy regarding the privacy of your nonpublic personal information and personally identifiable information (collectively “Nonpublic Personal Information”).

Information that We Collect

We may collect Nonpublic Personal Information from you or others, including your name, address, e-mail address, telephone numbers, Social Security Number, other information that permits us to contact or communicate with you, information about your financial situation including your employment or occupation, salary, assets, insurance and investment transactions, banking information, and other financial and tax information you may elect to supply to us.

How We Collect Information

We collect this Nonpublic Personal Information through various sources, including:

- Information we receive from you on new account forms, fact-finding questionnaires, product and service applications, and other forms;
- Information we receive from you, in writing, electronically, through the telephone, or through our website, when you communicate with us or request information about our products and services;
- Your transactions with us, our affiliates, and those affiliated and unaffiliated product sponsors with whom we have selling agreements or other arrangements for the provision of services to you;
- Consumer reporting agencies; and
- Affiliated and unaffiliated product sponsors with whom we have selling relationships and whose products you own.

Information that We Disclose

As permitted by law and as outlined in this policy, we disclose Nonpublic Personal Information to affiliates and unaffiliated third parties that provide services to us or with whom we have contractual relationships in order that we may carry out your directions and effectively and efficiently service your account. Examples of third parties with whom we may share your Nonpublic Personal Information include:

- Mutual fund companies, insurance companies, and other product sponsors in order to execute your investment and insurance purchases and sales and to allow for the servicing of your accounts;
- Clearing Agencies or other broker/dealers through whom we clear and settle your securities transactions;
- Companies providing account performance and/or reporting services on your accounts;
- Third party asset managers with whom we have relationships for the management of customer accounts;
- Banks and other financial institutions where our Financial Professionals are located and with whom we have arrangements for the marketing and sale of our products and services;
- Companies that provide services to us to assist with the maintenance of required books and records or to facilitate client mailings or publications on our behalf;
- State, Federal, and other regulatory and self-regulatory authorities as required by law or regulation;
- Other companies, associations, agencies, third parties, and institutions that provide services to us in order to more effectively and efficiently service your account; and those companies, associations, agencies, third parties, and institutions with which we or our Financial Professionals are licensees, registrants, or Members; and
- In certain situations, your Financial Professional when leaving our firm for another firm, as is outlined below. Where we share your Nonpublic Personal Information with third parties for the purposes noted above, we ensure that there are contractual agreements with the third party prohibiting their use and disclosure of that information for any purpose other than to carry out the purposes for which you disclosed the information or that such third party is prohibited by law from further sharing your information (such as regulators). Except under the circumstances outlined above, we will not share Nonpublic Personal Information with affiliated or unaffiliated third parties concerning our current or former customers for marketing purposes or otherwise.

Our Financial Professionals

We recognize that our clients have elected to open accounts with us due to the efforts of our Financial Professionals. Because of the importance of your relationship with your Financial Professional, if he or she elects to leave our firm for another registered broker/dealer, we may allow them to take your information with them to the new firm, subject to the requirements or limitations of applicable law. If you do not want your Financial Professional to transfer this information from our firm to his or her new firm in order to continue servicing your account in the event he or she decides to leave our firm for another registered broker/dealer, please contact us at (813) 264-0440 to opt out of this information sharing.

Steps We Take to Protect Your Information

We have security policies and procedures reasonably designed to prevent unauthorized use or access to your Nonpublic Personal Information. In addition to your Financial Professional and his or her office, your information is available to employees for various business purposes, such as processing or servicing transactions, and those fulfilling compliance, legal, or audit functions. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of your Nonpublic Personal Information in accordance with state and federal privacy regulations.

Municipal Securities Rulemaking Board (MSRB) Investor Information

When we make material amendments to our Privacy Policy, we will post an appropriate notice on our website. In addition, we may send you an amended version of our Privacy Policy through the mail.

Amendments to Our Privacy Policy

Calton & Associates, Inc. is registered with the U.S. Securities Exchange Commission (SEC) and the Municipal Securities Rulemaking Board (MSRB). The website address of MSRB is www.MSRB.org. An investor brochure that describes the protections that may be provided by MSRB's rules and how to file a complaint with an appropriate regulatory authority can be found at MSRB's website, at <http://msrb.org/~media/Files/Resources/MSRB-Investor-Brochure.ashx?la=e>