

This notice describes the Privacy Policy of Calton & Associates, Inc., a broker-dealer and Registered Investment Adviser. We are required by federal law to provide you with this notice, which outlines our business practices to protect your privacy as well as how we collect and share personal information about you. This policy applies to both current and former clients.

We Respect Your Privacy

Calton & Associates, Inc. ("Calton") is committed to protecting your privacy. Our firm relies on access to your personal financial information in order to provide you with relevant information regarding the products and services we offer and to provide you with appropriate investment recommendations. We appreciate and understand that the personal financial information you have entrusted to us is sensitive and confidential and we have adopted policies and procedures which assist us in safeguarding the information you provide to us. For that reason, we have adopted and adhere to the following policy regarding the privacy of your Non-public Personal Information and personally identifiable information.

Information that We Collect

Calton collects Non-public Personal Information from you in a number of ways including from the information provided on our new account applications and other forms we receive from you. The information includes the following:

- Your name, address, e-mail address, telephone numbers, Social Security Number, date of birth, income, tax information, employment or occupation, assets, financial objectives, investment experience and other forms you submit to us;
- We may access information regarding your account balances, your use of account(s), and the types of products and services you prefer through your interactions and transactions with us;
- We may obtain information about your creditworthiness and credit history from consumer credit reporting agencies;
- We may collect background information from and through third-party vendors to verify representations you have made and to comply with various regulatory requirements;
- Information we receive from you, in writing, electronically, by telephone or through our website, when you communicate with us or request information about our products and services;
- Your transactions with us and unaffiliated product sponsors with whom we have selling agreements or other arrangements for the services we provide to you;

Information that We Share

Calton does not share your Nonpublic Personal Information with unaffiliated third parties unless it is necessary to manage and service your account or as permitted or required by law. For example, we provide access to information about you to unaffiliated third parties in certain circumstances with whom we have contractual relationships to carry out your directions to manage and service your account. Examples of third parties with whom we may share your Non-public Personal Information include:

- Mutual fund companies, insurance companies, and other product sponsors in order to execute your investment and insurance transactions and to manage and service your accounts;
- Clearing Firms or other broker/dealers that execute, settle, clear securities transactions and maintain your accounts;
- Third parties providing account performance and/or reporting services on your accounts;
- Third party asset managers with whom we have agreements for the management of your accounts;
- Third parties that provide services to assist us with maintaining books and records or to facilitate client mailings or publications on our behalf;
- State, Federal, and other self-regulatory authorities as required by law or regulation;
- Other companies, associations, agencies, third parties, and institutions that provide services to us to manage and service your account;

When we share your Non-public Personal Information with third parties for the purposes noted above, we ensure that there are contractual agreements with the third parties prohibiting their use and disclosure of that information for any purpose other than to carry out the services you disclosed the information for and the third parties are prohibited by law from further sharing your information. Except under the circumstances outlined above, we will not share Non-public Personal Information with unaffiliated third parties concerning our current or former customers for marketing purposes or otherwise.

We recognize that your relationship with your Financial Professional is important. If your Financial Professional terminates his or her registration with Calton and registers with another broker/dealer, we may allow Financial Professional to take certain information about you to his or her new firm, which is generally limited to your name, address, telephone number, email address and account title subject to the requirements of applicable law. If you do not want your Financial Professional to take this information from Calton to their new firm, please contact us at (813) 264-0440 to opt out of this information sharing.

Steps We Take to Protect Your Information

We have internal policies and procedures which govern the handling of client information by employees. Third parties which provide account service and support on our behalf may also receive personal information about you, and we require them to adhere to appropriate security standards with respect to such information. In addition to your Financial Professional and his or her office staff, your information is available to employees for business purposes, including for processing or servicing transactions, managing your account, and to maintain compliance, legal, or audit functions. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we use other physical, electronic, and procedural safeguards to ensure the protection of your Nonpublic Personal Information in accordance with state and federal privacy regulations. Under no circumstances will Calton sell Non-Public Personal Information to anyone, for any reason, at any time.

Amendments to Our Policy

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

Contact Us with Questions

If you have any questions or concerns about our Privacy Policy or if you identify any information that you believe is no longer accurate, you may contact your Calton Financial Professional or call us at 813-264-0440 or write to Calton & Associates, Inc., Attention: Compliance Department, 2701 North Rocky Point Drive, Suite 1000, Tampa, FL 33607.