

# SCARBOROUGH

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## CAPITAL MANAGEMENT

### Important Notice Regarding Client Privacy

Scarborough Capital Management recognizes that security and protection of the personal information that we collect from you is an important responsibility. For this reason, we have adopted this privacy policy to explain how we obtain and use the information that is collected from you, as well as how we safeguard that information.

### INFORMATION THAT WE COLLECT

We may collect certain Nonpublic Personal Information from you or others for the purpose of providing you with advisory services. This information includes, but is not limited to:

- Information that you provide to your advisor directly and on applications, and other paperwork, when signing up for services. This information may include personal and household information such as income, spending habits, employment status, occupation, assets, banking information, financial goals and objectives, employee benefit information, and other financial and tax information that you may elect to supply to us;
- Personally Identifiable Information such as your name, age, social security number. We also collect information that permits us to contact you such as your telephone number, email address, and mailing address;
- Information about your transactions with us or others;
- Information that we receive from other agencies or businesses as needed to provide an appropriate recommendation or fulfill a service request.

### HOW WE COLLECT INFORMATION

We collect this Nonpublic Personal Information through a variety of sources, including:

- You, verbally and in writing, on new account forms, product and services applications, fact finding questionnaires, through the telephone, through our website, and when you communicate with us in other ways to request information on products and services;
- Affiliated and unaffiliated product sponsors with whom we have selling agreements and whose products you have applied for or have previously owned;
- Your savings plan administrator who provides information about your savings plan;
- Other individuals or entities that you may authorize us to obtain information from, such as your attorney or accountant.

### INFORMATION THAT WE DISCLOSE

Scarborough Capital Management does not disclose the Nonpublic Personal Information that we collect to others except:

- To government entities or other third parties in response to subpoenas or other legal process as required by law;
- To our chosen broker/dealer in order that they may meet their supervisory requirements set forth by the Financial Industry Regulatory Authority (FINRA);
- To product wholesalers for the purposes of expense reimbursement, should you elect to attend a wholesaler sponsored event;
- To Retirement Management Systems, Inc. for the discretionary management of your Savings Plan Management<sup>SM</sup> account, should you elect to use this service;
- To our chosen financial planning software provider, eMoney, should you elect to use this service;
- To our digital marketing and website development partners through client and prospect use of the [www.scmadvice.com](http://www.scmadvice.com) website, should you elect to enter your information on our website;
- To our Contact Relationship Management (CRM) software providers, indirectly, through their ability to access our internal systems;
- To unaffiliated third parties such as our attorneys and other consultants, as well as companies that provide services to us to assist us with maintenance of required books and records or to facilitate client mailings.

### HOW WE PROTECT YOUR PERSONAL INFORMATION

Scarborough Capital Management maintains physical, electronic and procedural security measures designed to prevent unauthorized use or access to your Nonpublic Personal Information. Our computer systems utilize password protection to prevent access by unauthorized personnel. We also restrict the access of your personal information to representatives and employees who need the information to perform their responsibilities within our Firm or to fulfill our service obligations to our clients.

### FORMER CLIENTS

Should you close your account(s) or become an inactive client, we will maintain your records according to the requirements established by the FINRA and U.S. Securities and Exchange Commission (SEC). We will continue to protect your personal information in accordance with our privacy policies as outlined in this document.

### CHANGES TO OUR PRIVACY POLICY

If we make any material changes to our Privacy Policy, we will provide you with written notice.