Courtlandt

Governing Our Relationship

Updated as of 11.05.26

Privacy Policy

The "Courtlandt" companies include: Courtlandt Financial Group, Inc., Courtlandt Securities Corporation, a registered broker-dealer, member of FINRA and SIPC; and Courtlandt Insurance Services, a Licensed Insurance Agency;

Your relationship with Courtlandt is based on trust and confidence. To fulfill its responsibilities to you, Courtlandt requires that you provide current and accurate financial and personal information. Courtlandt will protect the information you have provided in a manner that is safe, secure and professional. Courtlandt and its employees are committed to protecting your privacy and to safeguarding that information.

Categories of Information We Collect

Courtlandt collects nonpublic information from the following sources:

- Information we receive from you or those you authorize on applications or other forms (such as your name, address, phone number, social security number, occupation, assets, income, and other financial and family information);
- Information relating to your transactions with us or with others (such as account numbers, holdings, balances, transaction history and other financial and investment activities);
- Information about that may be received from other sources with your consent or with the consent of your introducing broker

Courtlandt is committed to the protection and privacy of its customers' and consumers' personal and financial information. Courtlandt will not share such information with any nonaffiliated third party except as permitted by law, such as:

- When necessary to complete a transaction in the account, such as with the clearing firm or account custodians
- When required to maintain or service the account, such as executing transactions or providing products and services

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- To resolve customer disputes
- When requested by a fiduciary or beneficiary on the account
- To our attorneys or accountants
- When required by a regulatory agency, or for other reasons required or permitted by law
- In connection with a sale or merger of any of Courtlandt's entities
- In any circumstance that has the customer's instruction or consent.

Text Messaging Information

We do not share mobile contact information with third parties or affiliates for marketing or promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We will take the following steps if a determination is made that our customer data has been compromised:

- Document the incident(s)
- Verify the incident(s) as to what data was compromised
- Notify customers affected via e-mail of what data is believed to be compromised and how to monitor their credit report
- Notify authorities if applicable

Protection of Personal Information

Courtlandt prohibits the disclosure of your nonpublic personal information by all of our representatives, affiliates and third party service providers except as required or permitted by law. Furthermore, Courtlandt restricts access to your personal and account information to those representatives who need to know that information to provide products or services to you. Courtlandt maintains physical, electronic, and procedural safeguards to guard your nonpublic personal information. Additionally, should a client decide to close their account(s) or become an inactive customer, we will adhere to the privacy policies described in this notice.

Courtlandt reserves the right to make changes to this policy. For more information relating to Courtlandt's privacy policy, please contact us at the numbers or email address below.

Consumer Identification Program

To help the government fight the funding of terrorism and money laundering activities, Federal Law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.

When you open an account, we will ask for your name, date of birth, address, identification number and other information that will allow us to identify you. We may also ask to see your

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driver's license or other identifying documents. (Identification # - U.S. Citizen: taxpayer id #. Non U.S. Citizen: taxpayer id#, passport # and country of issuance, alien ID card # or government-issued id showing nationality, residence, and a photograph of you).

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, FINRA, and New York Stock Exchange rules already require you to provide most of this information.

These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

Business Continuity Plan Summary

Courtlandt Securities Corporation ("CSC") has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – Should we encounter a significant business disruption, you may contact us as you usually do at **800-994-7094**. This number is VoIP (voice over internet protocol) technology and not a LAN line (local area network). Therefore, we can make and retrieve calls and messages using a broadband internet connection from any location where internet access remains available.

Accessing Your Investments - Courtlandt does not hold customer funds or investments. All investments are made directly with the investment company. You may contact them directly for information regarding your investments, be it a mutual fund, annuity, insurance policy, real estate company, or a third-party IRA retirement plan custodian. Please refer to the investment-specific account statement for instructions on how they may provide prompt access to funds and securities, enter orders, process other trade-related items, get cash, or any questions or transactions relating to your account.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

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Our business continuity plan addresses: data backup and recovery; all mission-critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank, and counterparty impact; regulatory reporting; and assuring our customer's prompt access to their funds and securities if we are unable to continue our business.

Our firm backs up our important records in a geographically separate area. While every emergency poses unique problems based on external factors, such as time of day and the severity of the disruption, our firm's objective is to restore its operations, complete existing transactions, and immediately accept new transactions and payments. Your orders and requests for funds and securities may be delayed.

Varying Disruptions – Significant business disruptions can vary in their scopes, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24-72 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within 48-72 hours. In either situation, we plan to continue in business, transfer operations to another firm if necessary and notify you through email how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, please seek assistance directly from the investment company.

For more information – If you have further questions about our business continuity planning, you can contact us at **800-994-7094** or email us at info@courtlandtgroup.com. This form will remain available on the company website at www.courtlandtgroup.com.

Anti-Money Laundering Customer Notice

The USA Patriot Act signed by President Bush in October 2001 imposes new anti-money laundering requirements on brokerage firms and other financial institutions. By April 24, 2002, all brokerage firms were required to have new, comprehensive anti-money laundering programs in place.

What is money laundering?

Money laundering is the process of transferring illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including fraud, illegal arms sales, racketeering, drug trafficking, robbery, and terrorism.

How big is the problem and why is it important?

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The use of the U.S. financial system by criminals to facilitate terrorism or other crimes could well taint our financial markets. According to the U.S. State Department, one recent estimate put the amount of worldwide money laundering activity at $1 trillion per year.

What are we required to do to combat money laundering?

Under new rules required by the USA PATRIOT Act, our anti-money laundering program must designate a special compliance officer, conduct employee training, conduct independent audits, and establish policies and procedures designed to detect and report suspicious transactions and ensure compliance with the new laws. These rules require us to search your name or account with the Office of Foreign Assets Control (OFAC).

As part of these requirements, we will be asking you to provide various identification documents or other information. Until you provide the documents or information we need, we will not be able to open an account or effect any transactions for you.

We thank you for your patience and hope you will support our efforts to deny terrorist groups access to America's financial system.

SECURITIES INVESTOR PROTECTION CORPORATION (SIPC)

COURTLANDT SECURITIES CORPORATION IS A MEMBER OF THE SECURITIES INVESTOR PROTECTION CORPORATION (SIPC). INFORMATION CONCERNING SIPC, INCLUDING THE SIPC BROCHURE, CAN BE FOUND AT WWW.SIPC.ORG OR BY CALLING SIPC AT (202) 371-8300.

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