

**Alternative Capitalis, LLC**

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**Privacy Policy Information**

The privacy policy statement is given to clients at the initial signing of the client contract and mailed or emailed once annually. The Chief Compliance Officer (hereinafter “CCO”) will document the date the privacy policy statement was mailed to each client for each year. Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

**Collection & Sharing of Clients’ Personal Information**

Alternative Capitalis, LLC (hereinafter “Alt Capitalis”) follows an “opt-in” policy as required by Massachusetts General Laws;

*M.G.L. c. 110A*

*950 CMR 12.205(9)(c)(13) states that for the purposes of M.G.L. c.110A, it is deemed a dishonest and unethical business practice for an investment adviser to:*

*“[disclose] the identity, affairs or investments of any client to any third party unless required by law to do so, or unless consented to by the client”*

*The current regulation prohibits the state registered investment adviser from sharing non-public personal information with non-affiliated third parties unless the customer specifically consents to the disclosure. Hence, unlike the GLBA (Gramm-Leach-Bliley Act), a state registered investment adviser must give its customers an “opt-in” option to share information with any unaffiliated third parties. An “opt-in” requires the investment adviser to obtain from its customers and consumers a signed statement in which the person makes an affirmative declaration of permission to disclose such information. Without this affirmative affirmation from the person, investment advisers are prohibited from sharing this information with non-affiliated third parties.*

The Massachusetts Securities Division has published a policy notice on this matter that is available on their website at <https://www.sec.state.ma.us/sct/sctgbla/gblaidx.htm>.

Alt Capitalis will not share NPI (non-public personal information) with non-affiliated third parties unless a client has opted in of certain sharing through a signed statement in which the client makes an affirmative declaration of permission to disclose such information. We collect NPI about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

Alt Capitalis collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us or others; and
- Information we receive from a consumer reporting agency.

Below are the reasons for which Alt Capitalis may share a client’s personal information:

- For everyday business purposes – such as to process client transactions, maintain client account(s), respond to court orders and legal investigations, or report to credit bureaus;

- For our marketing – to offer our products and services to clients;
- For joint marketing with other financial companies;
- For our affiliates’ everyday business purposes – information about client transactions and experiences; or
- For non-affiliates to market to clients.

If a client decides to close the account(s) with Alt Capitalis or otherwise leave Alt Capitalis’s service, Alt Capitalis will adhere to the privacy policies and practices as described in this notice.

### **Safeguarding of Clients’ Personal Information**

Alt Capitalis restricts access to clients’ personal and account information to those employees who need to know that information to provide products or services to the client. Alt Capitalis maintains physical, electronic, and procedural safeguards to guard nonpublic personal information.

The following employees will manage nonpublic information: The Firm’s CCO

The following individuals also have access to this nonpublic information: Available upon request

To mitigate a possible breach of the private information Alt Capitalis will encrypt all data that individuals have access to or use password sensitive documents. The system will be tested and monitored at least annually.

Alt Capitalis has taken extensive measures to safeguard the privacy and integrity of the information that it gathers, stores, and archives during its normal business practices. Computer security measures have been instituted where applicable including passwords, backups, and encryption. All employees are informed and instructed on various security measures including the non-discussion and/or sharing of client information, always removing client files from desktops or working areas that cannot be locked or secured, and proper storage of client securities files in locked files or other secured location. Alt Capitalis uses various methods to store and archive client files and other information. All third-party services or contractors used have been made aware of the importance Alt Capitalis places on both firm and client information security. In addition to electronic and personnel measures Alt Capitalis has implemented reasonable physical security measures at our home office location, and encouraged all remote locations, if any, to do the same to prevent unauthorized access to our facilities.

Alt Capitalis will retain records for at least 5 years, or as otherwise required by applicable state or federal law. With respect to disposal of nonpublic personal information, Alt Capitalis will take reasonable measures to protect against unauthorized access to or use of such information in connection with its disposal.

### **Federal Law Gives You the Right to Limit Sharing**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out (if you have previously opted-in) of these types of sharing.

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

*Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.*