

# Hoffman, Alan N. Investment Management

## PRIVACY POLICY NOTICE

Hoffman, Alan N. Investment Management **committed to adhering to the requirements and expectations regarding the privacy of personal information.**

<b>Privacy regulations are founded upon three definitions:</b>	
<b>Consumer</b>	A person who has not entered into an investment advisory relationship but has disclosed nonpublic personal information to our firm.
<b>Client</b>	A person who has entered into an investment advisory relationship with the firm or that individual's designated representative.
<b>Confidential Information</b>	Personally identifiable private information, not available from public sources, about a client or consumer. It generally includes name, address, age, social security number, assets, income, net-worth, account balances, account numbers, beneficiary information, or investment history.
<b>Information We Collect:</b>	
<p>In connection with providing financial advice, or other advisory services, we obtain non-public personal information about you, including:</p> <ul style="list-style-type: none"> <li>• Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;</li> <li>• Information about your transactions with us, our affiliates, or others;</li> </ul>	
<b>Information We Disclose:</b>	
<p>We may only disclose information that we collect in accordance with this policy. Hoffman, Alan N. Investment Management does not sell customer lists and will not sell your name to telemarketers.</p>	
<b>Parties to Whom We Disclose:</b>	
<p>We will not disclose information regarding you or your account at Hoffman, Alan N. Investment Management, except under the following circumstances:</p> <ul style="list-style-type: none"> <li>• To entities that perform services for us or function on our behalf, including financial service providers, such as a custodial broker-dealer, investment company, or insurance company, other investment advisers;</li> <li>• To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;</li> <li>• To your attorney, trustee or anyone else who represents you in a fiduciary capacity;</li> <li>• To our attorneys, accountants or auditors; and</li> <li>• To government entities or other third parties in response to subpoenas or other legal process as required by law;</li> <li>• To comply with regulatory inquiries.</li> </ul>	
<b>How We Use Information:</b>	
<p>Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you, such as:</p> <ul style="list-style-type: none"> <li>• To complete transactions or account changes, as directed by the client;</li> <li>• To protect your accounts/non-public information from unauthorized access or identity theft;</li> <li>• To establish or maintain an account with an unaffiliated third party, such as a custodial broker-dealer providing services to you and/or Hoffman, Alan N. Investment Management;</li> <li>• To maintain or service your accounts;</li> <li>• To comply with Federal and/or State Regulatory requirements;</li> <li>• To keep you informed about financial services of interest to you.</li> </ul>	

**Security Policy:**

We restrict access to nonpublic personal information about you to individuals who need to know that information to provide products or services to you and to perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information. Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

**Regulation S-AM:**

A registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Hoffman, Alan N. Investment Management does not receive information regarding marketing eligibility from affiliates to make solicitations.

**Opt-In Policy:**

Non-public personal confidential information is any personal information, not available from public sources, about a client or consumer. It generally includes name, address, age, social security number, assets, income, net-worth, account balances, account numbers, beneficiary information, or investment history that cannot be found in public sources. Publicly available information would be details available from federal, state, or local government records; widely distributed media (such as telephone directories or newspapers); or information disclosed to the public as required by federal, state, or local law. Under Gramm-Leach-Bliley Act, each investment adviser must give its customers the firm's privacy policies. Therefore, our firm would like you to know that Hoffman, Alan N. Investment Management may disclose clients' non-public confidential information to non-affiliated third parties. Our firm will cease disclosing client's information upon that client's termination from our firm. Our firm cannot share confidential information to non-affiliated third parties without first obtaining a signed statement in which the person makes an affirmative declaration of permission to disclose such information.

\_\_\_\_\_(Client Initial Here) I hereby **opt-in** to allow Hoffman, Alan N. Investment Management to disclose  
\_\_\_\_\_(Client Initial Here) my non-public confidential information to non-affiliated third parties.

**Exceptions to Opt-In:**

The opt-in requirement also **does not** apply to disclosure of confidential information in the following circumstances:

- For resolving consumer or customer disputes or inquiries;
- To persons holding a legal or beneficial interest relating to the consumer or customer;
- To persons acting in a fiduciary or representative capacity on behalf of a consumer or customer;
- To provide information to agencies assessing your firm's compliance with industry standards, and to your attorneys, accountants, and auditors;
- In connection with the sale or merger of our firm;
- To respond to a regulator's examination;
- To comply with a civil, criminal, or regulatory investigation by federal, state, or local authorities.

**Closed or Inactive Accounts:**

If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Changes to This Privacy Policy:**

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Hoffman, Alan N. Investment Management, 300 2nd Avenue, Unit 4186, Needham Heights, MA 02494; (617) 308-5087.

**Complaint Notification:**

Please direct complaints to: Hoffman, Alan N. Investment Management, 300 2nd Avenue, Unit 4186, Needham Heights, MA 02494; (617) 308-5087.