



# ELIOT ROSE ASSET MANAGEMENT, LLC

## PRIVACY NOTICE • EFFECTIVE JUNE 2021

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Eliot Rose Asset Management, LLC (hereinafter "Eliot Rose", "our" or "we") does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

### COMMITMENT TO YOUR PRIVATE INFORMATION

Eliot Rose is committed to safeguarding the confidential information of its clients. Eliot Rose holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, Eliot Rose does not share confidential information about clients with nonaffiliated parties.

It is the policy of Eliot Rose to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of Eliot Rose. Eliot Rose permits only authorized employees and affiliates who have signed a copy of Eliot Rose's Privacy Policy to have access to client information.

Employees violating Eliot Rose's Privacy Policy will be subject to Eliot Rose's disciplinary process. If there are any changes to this policy, we will provide clients with written notice and clients will be provided an opportunity to direct Eliot Rose as to whether such disclosure is permissible.

### WHY WE COLLECT AND HOW WE USE INFORMATION

To conduct regular business, Eliot Rose may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm
- Information about the client's transactions implemented by the firm or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Eliot Rose to provide access to customer information within the firm and to nonaffiliated companies, with whom we have entered into agreements.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by Eliot Rose to facilitate the commencement/continuation/termination of a business relationship between the client and/or between Eliot Rose and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of Eliot Rose (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

## SHARING INFORMATION WITH OTHER COMPANIES PERMITTED UNDER LAW

Eliot Rose may disclose the client's information: (1) to individuals and/or entities not affiliated with Eliot Rose, including, but not limited to the client's other professional advisors and/or certain service providers that may be recommended or engaged by Eliot Rose in furtherance of the client's engagement of Eliot Rose (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

Since Eliot Rose, Inc. shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. In the event that the firm has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure.

## HOW WE PROTECT YOUR INFORMATION

Eliot Rose maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protect against threats or hazards to the security of such information and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical, electronic and physical safeguards
- Security procedures related to the processing, storage, retention and disposal of confidential information
- Programs to detect, prevent and, when necessary, respond to attacks, intrusions or unauthorized access to confidential information
- Restricting access of customer information to employees who need to know that information to provide products and services to you, and appointing specific employees to oversee our information security program

We will not retain your personal information longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

## CHILDREN

Our Site is not directed to children under the age of 13 years and we request that these individuals do not provide Personal Information through our Site. We do not knowingly collect information from children under 13 without parental consent. Visit the [Federal Trade Commission](#) website for more information about the Children's Online Privacy Protection Act (COPPA).. By using our Site, you represent and warrant that you are at least 18 years old.

We respect the privacy of your children and do not knowingly collect or retain personally identifiable information from children under the age of 18 through this web site. However, we may process personal data, on a child's behalf, with permission from the parent or guardian. To the extent we have unintentionally collected any Personal Data on our Site from a person under the age of 13 years old, you may request and obtain removal of this Personal Data. To make such a request, please send an email with a detailed description of the specific content or information to the e-mail address below.

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Eliot Rose maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information. Through this policy and its underlying procedures, Eliot Rose attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

## FORMER CUSTOMERS

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

## CHANGES TO THIS POLICY

Eliot Rose will provide each client with initial notice of the firm's current policy when the client relationship is established. **Additionally, Eliot Rose may occasionally amend this Privacy Policy at any time. If we decide to use personal information in a manner that is materially different from that stated at the time it was collected, we will notify you of such changes prior to implementing them by posting a revised Privacy Policy with a new “Last Updated” date. Eliot Rose shall also provide each client with the current Privacy Policies at least annually.**

**CONTACT US:** Should you have any questions regarding the above, please contact:



**JASON SIPERSTEIN, CHIEF COMPLIANCE OFFICER**

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