

Collegiate Capital Management, Inc.  
Client Privacy Policy

Collegiate Capital Management, Inc. (CCM) values you as a client and respects your right to privacy. We recognize that you have retained our firm for investment advisory services with the expectation that this will be a long-term relationship that assists you in meeting your financial goals.

Protecting your privacy has been and will continue to be vital to our business. We want our clients to understand the types of information we collect and how we use it. By disclosing our Privacy Policy to you, we hope that you will better understand how we keep your information private and secure while using it to serve you better.

Why We Collect Your Information

CCM gathers information about you and your account so that we can (i) confirm your identity to comply with the many laws and regulations that govern our firm, (ii) determine your risk tolerance and establish investment objectives and investment approaches that are suitable for your portfolio and (iii) provide quality asset management and complementary financial advice.

What Information We Collect

Nonpublic personal information is information that we obtain from you to provide services to you. We may collect the following types of nonpublic personal information from you:

- Information related to your identity, including but not limited to your name, address, date of birth, and social security number;
- Information related to your transactions with us; and
- Information provided on account applications, such as your beneficiaries or financial data.

The firm also collects certain public information such as your address and phone number.

Confidentiality and Security

We restrict access to ‘nonpublic personal information’ to those employees within our organization who need to know that information to provide investment services to you. Additionally, we maintain physical, electronic and procedural safeguards to ensure your ‘nonpublic personal information’ is handled responsibly and in accordance with federal standards and regulations, our firm’s Privacy Policy, and Cyber Security Plan.

What Information We Disclose

CCM is permitted, and in some cases required by law, to disclose ‘nonpublic personal information’ about you to certain third parties. For example, we may disclose personal information about you to third parties to assist us in servicing your accounts and to government entities for tax reporting, to satisfy a court order, or to comply with regulatory agencies assessing our firm’s compliance with industry regulations.

We have an affirmative and continuing obligation to respect client privacy and to protect the security and confidentiality of public and ‘nonpublic personal information.’ We will adhere to the privacy policies and practices as described in this notice even if you decide to close your account(s) and/or become an inactive client. If you require any additional information regarding Collegiate Capital Management, Inc.’s privacy practices, please contact us.

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