

## PRIVACY NOTICE

### PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY GRAMM-LEACH BLILEY & REGULATION S-P

Grimes & Company, Inc. (“Grimes”, “we”, “our” or “us”) is committed to maintaining the privacy of current and prospective clients. This “Privacy Notice” describes how we collect, store, use, disclose and protect your personal information that may directly, or indirectly, identify you during and after your working relationship with us and/or through our “Website”. We use the term “personal information” to describe information that can be associated with you and can be used to identify you. Personal information does not include information that does not identify a specific person or that is publicly available. In particular, this Privacy Notice describes the basis upon which and for what purposes we process your personal information, how we share your personal information and how we protect and safeguard your personal information.

By working with us and using this Website, you agree to the terms and conditions of Privacy Notice as more fully described below.

#### **Information We Collect**

When you engage Grimes to provide investment advice, investment products or other services and, when you use our Website, we may collect certain information relating to that use and/or then engagement, some of which may be personal information including:

- Information we receive from you on account applications, e.g., your name, address, telephone number, date of birth, social security number, email address, occupation, assets income, transaction history, and other personal information;
- Information we receive from you in order to determine your investor profile, e.g., demographic information, investment preferences, location information or financial information; and
- Information about your transaction history with third-parties, including other financial professionals.

In order to run its everyday business, Grimes needs to share nonpublic personal information about our clients. We will only disclose information that we collect in accordance with this policy. We do not disclose any nonpublic personal information about clients to any non-affiliated parties, except to third-party service providers that assist in the operation of our business. To provide necessary business services to your account and on your behalf, we may

disclose nonpublic personal information to service providers such as custodians and brokerage firms, all of which are required to maintain the confidentiality of such information. The personal information we share for business purposes may include any of the categories of personal information identified in this Privacy Notice that we may collect.

Grimes restricts access to nonpublic personal information about you to those employees, agents, or other parties that need to know the information to provide services to you. We may, however, disclose your personal information under the following circumstances:

- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors;
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

### **How Your Personal Information is Collected:**

We collect most of this personal information directly from you—in person, by telephone, email and/or via our Website and apps. However, we may also collect information:

- From publicly accessible sources;
- Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent (e.g., your bank); and
  - From cookies on our Website.

When you access our Website, we, or third parties we hire to track how our Website is used, may place small data files called “cookies” on your browser or other access device. Cookies are pieces of data stored on your device and are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server.

*For more information, please visit our [Cookie Policy](#).*

### **Our Use of Personal Information**

We may use your personal information to (i) provide information, products or services you request; (ii) verify your identity when accessing our services; (iii) enforce our Terms of Use and any other agreements between you and Grimes; (iv) improve, modify, customize, and measure Grimes’ services; (v) provide you with information about Grimes’ products and services, including while you are on the Website or after you visit and/or use our Website; (vi) compare

information for accuracy and verify our records; (vii) detect and prevent fraud or other criminal activities; or (viii) in other ways indicated in our agreement with you.

### **How Long Your Personal Information Will Be Kept:**

We will keep your personal information while you have an account with us or while we are providing investment advisory services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

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

We maintain physical, electronic, and procedural security measures to safeguard confidential client information. Grimes has adopted the following policies in order to safeguard the personal information of our clients in accordance with applicable law:

1. Grimes is committed to protecting the confidentiality and security of the information it collects and will handle nonpublic personal information about clients only in accordance with all applicable laws, rules and regulations. We shall ensure: (a) the security and confidentiality of client records and information; (b) that client records and information are protected from any anticipated threats and hazards; and (c) that unauthorized access to, or use of, client records or information is protected against. These security measures include computer safeguards and secured files and buildings.
2. Grimes will maintain policies and procedures that are reasonably designed to safeguard nonpublic personal information about clients and only permit appropriate and authorized access to, and use of, nonpublic personal information about clients through the application of appropriate administrative, technical, and physical protections.
3. To the extent required by applicable law, we shall direct each of our service providers to adhere to the Privacy Notice of Grimes with respect to all nonpublic personal information about clients provided to such service providers.
4. Grimes Company shall not disclose any nonpublic personal information about its clients or former clients to anyone, except as permitted or required by law.

5. Grimes shall issue notices of its Privacy Notice to its clients initially and on an annual basis thereafter to the extent required by applicable law.

By disclosing your personal information to Grimes, you consent to the collection, storage, and processing of this information by us in a manner consistent with this Privacy Notice.

### **Updating and Correcting Your Personal Information**

Keeping your information accurate and up to date is very important. You may review or update certain account information by contacting us. If your personal or account information is incomplete, inaccurate or not current, please contact your financial professional or Grimes at (508) -366-3883.

### **Other Information**

**Linking to Other Websites :** We may provide links to third party websites. If you follow links to third-party websites not affiliated or controlled by Grimes, you should review that third-party's privacy and security policies and other terms and conditions, as they may be different from our Privacy Notice. We do not guarantee and are not responsible for the privacy or security of these third-party websites, including the accuracy, completeness, or reliability of their information.

**Children's Privacy Online:** We respect the privacy of children and encourage parents to supervise their children's computer usage. Our Website is not directed or intended for individuals under the age of thirteen (13), and we request that these individuals do not provide personal information through the Website. We do not knowingly collect or retain information from children under the age of 13 without parental consent. Visit the [Federal Trade Commission](#) website for more information about the Children's Online Privacy Protection Act (COPPA).

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Notice will continue to apply to you.

**Changes to This Privacy Notice:** This Notice was last updated on date noted above. We may change this Notice from time to time. Please review it periodically. If we make changes to this Privacy Notice, we will revise the "Effective Date" at the top of this page. Any changes to this Notice will become effective when we post the revised Privacy Notice on the Website. Your use of our Website following these changes means that you accept the revised Privacy Notice

**How To Contact Us:** Please contact us by USPS, email or telephone if you have any questions about this Privacy Notice, what information we collect about you, how we share your personal information or how we safeguard your personal information.

Our contact details are shown below:

Michael J. Davide, Chief Compliance Officer, Grimes & Company, Inc., 110 Turnpike Road, Suite 100, Westborough, MA 01581 or (508) 366-3883.