



## Privacy Policy

*Revised October 2017*

The Baldwin & Clarke Companies (“Baldwin & Clarke”) strongly believes in protecting the privacy, confidentiality and security of information we collect about you. This notice describes our Privacy Policy and articulates how we treat the information we receive about you, your family and your business.

### SCOPE:

This policy represents The Baldwin & Clarke Companies and related entities, inclusive of Baldwin & Clarke Advisory Services, Inc., Baldwin & Clarke Corporate Finance, Inc., 1<sup>st</sup> BCCW Capital Corp., Baldwin & Clarke Retirement Plan Services, Inc., and Baldwin & Clarke, LLP.

### WHY WE COLLECT AND HOW WE USE INFORMATION:

When we evaluate your request for our services, provide investment advice to you, or facilitate transactions on your behalf, you typically provide us with certain personal information necessary to perform these duties. This information may also be shared among the respective Baldwin & Clarke entities as referenced above in order to better serve your financial needs. With your consent, we may disclose your information to attorneys, accountants, lawyers, securities professionals and others to assist us, or them, in providing services to you. We may also share information with companies that perform services on our behalf, such as companies that we hire to perform marketing, administrative, or consultative services.

### WHAT INFORMATION WE COLLECT:

The personal information we collect may include:

- Name and address;
- Social Security or taxpayer ID number;
- Assets;
- Income;
- Account balance;
- Investment objectives;
- Investment activity;
- Accounts at other institutions;
- Corporate financials and;
- General business information

### CONFIDENTIALITY:

In the event you engage one of our entities on a confidential basis, we restrict access to your confidential, nonpublic personal information only to those employees who need to know such information in order to provide you with the quality financial products and services you deserve. We treat information about current and former clients and their accounts in a confidential manner. 1<sup>st</sup> BCCW Capital Corp. (“1<sup>st</sup> BCCW”) maintains a business relationship with Chartworth, LLC. In the event Chartworth conducts business exclusively through 1<sup>st</sup> BCCW without engaging any other Baldwin & Clarke entity, or formally requests that the nature of a specific engagement is proprietary and confidential in nature, 1<sup>st</sup> BCCW and its representatives will refrain from sharing information with other Baldwin & Clarke entities.

## **HOW WE PROTECT INFORMATION**

We do not sell your personal information to anyone. Our employees may access information and provide it to third parties only when completing a transaction for your account or providing services to you. Companies we may hire to provide support services are not allowed to use your personal information for their own purposes. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information. Our employees, registered representatives, and managers and counselors are required to comply with our established information confidentiality provisions. Nevertheless, we may disclose your nonpublic personal information to self-regulatory authorities and other regulatory authorities, law enforcement or other governmental authorities as reasonably necessary to conduct our business or as otherwise permitted by law.

## **ACCESS TO AND CORRECTION OF INFORMATION**

Generally, upon your written request, we will make available your information for your review. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records.

## **FURTHER INFORMATION**

If you would like to prevent the sharing of information among the Baldwin & Clarke affiliates or have any questions or inquires relative to our privacy policy, please direct them in writing at 116 A South River Rd., Bedford NH 03110 or by calling (603) 668-4353.