

Privacy Policy for:
Cadaret, Grant & Co., Inc.
Cadaret, Grant Agency
Capital Strategy Group, Ltd.
One Lincoln Center
Syracuse, NY 13202

Cadaret, Grant & Co., Inc., an independent broker/dealer, respects the privacy of any nonpublic, personal information that clients provide in order for us to open and service their accounts. We are committed to safeguarding that information by holding it in the strictest confidence. We gather only information that is necessary for us to effect, administer, or enforce a transaction that a client authorizes or requests. Such information may include health and financial information that has been gathered from account applications and other forms needed to service accounts.

To further protect client privacy, we have policies in place to restrict employee access to personal information. We may disclose personal information to other financial institutions for the sole purpose of effecting a transaction requested or authorized by a client, or to service a product or to provide a service that a client has requested or authorized.

If a client transfers an account, in the process of transferring the account investments Cadaret, Grant may share information with the new broker/dealer or custodian. If a representative servicing an account leaves Cadaret, Grant to join another firm, the representative may retain copies of the information so that he or she can assist with the transfer of accounts and continue to serve clients at his or her new firm. Cadaret, Grant does not disclose information to nonaffiliated companies that intend to market their products.

Opting out of third-party disclosures: If clients do not want to share information (other than as prescribed by law) with nonaffiliated third parties, including the registered representative servicing their account when he or she is no longer a Cadaret, Grant Representative, clients should contact the Cadaret, Grant Compliance Department at 800.288.8601.

At times, federal and state regulators may also review firm records as permitted by law. We do not provide nonpublic, personal information to mailing list vendors or solicitors under any circumstances. Any information gathered will be maintained during the client's tenure, and for the required time thereafter that records are required to be maintained by federal and state securities laws.

(over, please)

Regulatory Disclosures:

Information regarding the Securities Investor Protection Corporation (SIPC), including a SIPC brochure, can be obtained from the SIPC Web site at www.sipc.org, or by telephone at 202.371.8300.

Cadaret, Grant maintains a business continuity plan, including alternate processing facilities, to address disruptions in our normal course of business. These plans are reviewed annually and updated as necessary. In the event of a significant business interruption, information will be posted on the Cadaret, Grant public Web site (www.cadaretgrant.com), providing investors and financial advisors with alternate methods to contact us and conduct business.

The Cadaret, Grant Compliance Department can be reached at 800.288.8601 or in writing to Cadaret, Grant & Co., Inc., One Lincoln Center, Syracuse, New York, 13202 regarding questions, concerns, or complaints.

The Financial Industry Regulatory Authority (FINRA) has published an investor brochure that describes its *Public Disclosure Program*. A copy may be obtained at www.finra.org.