

Client Privacy Policy Disclosure

Overview

The following describes how Samuel A. Ramirez & Co., Inc. and its subsidiaries and affiliates (collectively, “Samuel A. Ramirez & Co.”) handles your personal information, and the steps it takes to protect your privacy.

Ramirez wants you to understand how we protect your privacy when we collect and use personal information in the normal course of business and what measures are taken to safeguard your information. Keeping customer information secure and private is our top priority at Ramirez.

Pursuant to the Gramm Leach Bliley Act (“Act”) which requires firms to disclose our policy regarding customer privacy and the use of non-public personal information as it applies to both current and former customers, and is designed to comply with the privacy provisions in Title V of the Act, as well as applicable federal privacy regulations.

Please take a moment to review our Privacy Policy and contact us with any questions you may have.

Collecting Non-public Personal Information

While providing service to you, we collect non-public personal information from sources including, but limited to, the following:

- Account Applications and other standard forms i.e. name, address, tax identification number, asset types and amounts of investments, transactions and income;
- Information we receive as a result of the transactions that you undertake with us or an affiliate; and
- Information about your transactions we receive from our clearing firm and/or any consumer reporting agency.

Protecting the Confidentiality and Security of Non-Public Personal Information

Ramirez, will restrict access to any personal and/or account information to those employees who do not require the information to deliver the products and services you request. Accordingly, we maintain physical, electronic and procedural safeguards to protect non-public customer information.

Disclosing Non-public Personal Information to Non-affiliated Third Parties

It is Ramirez policy not to sell, share or disclose information or records regarding current or former customers with non-affiliated third-party marketing companies or anyone, except as permitted or required by law. Ramirez may disclose non-public personal information as necessary to process transactions on your behalf, to conduct our operations, to follow your instructions as authorized, to protect the security of our financial records and to comply with requests during regulatory reviews and examinations.

Disclosing Non-public Personal Information to Ramirez Capital Affiliates

Ramirez is permitted by law to share within our family of affiliated companies, information about our transactions or experiences with you, such as account information or investment history.

Ramirez & Co. does not disclose any personal non-public information to any non-affiliated third party for purposes of marketing or any purpose other than a stated above.