

**Gray Equity Management, LLC's Policy on Disclosure of Your  
Personal Information**

**THIS DOCUMENT CONTAINS IMPORTANT INFORMATION ON OUR CONCERN FOR  
PROTECTING YOUR RIGHTS UNDER FEDERAL PRIVACY LAWS**

The Gramm-Leach-Bliley Act requires us to inform you of our policies relating to the disclosure to others of confidential information. Notwithstanding this new law, your privacy has always been of paramount importance to us. While information is the cornerstone of our ability to offer excellent service, Gray Equity Management, LLC recognizes our most important asset is our clients' trust. We are particularly concerned about the privacy of our individual clients who obtain financial products and services from us for personal, family, or household purposes. This notice provides you with our privacy policies and practices with respect to the disclosure of personal information about you.

We receive personal information about you and all our clients from information you submit to us on forms, applications, tax returns, conversations and through information we obtain over the course of your business relationship with us, our affiliates, and others.

Personal information is information that we obtain from you that is not otherwise available from public sources. The categories of personal information we collect include the following:

- < Information received from you on applications and other forms such as your name, address, birth date, social security number, names of family members, assets, and income.
- < Information about your transactions with us, our affiliates, or others, such as your account balances, investments, current and prior tax information, credit card usage and trading history.

With your permission, we may disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, auditors or broker/dealers.

Also, we may disclose personal information about you to our affiliated Certified Public Accounting firm, Gray, Gray & Gray, LLP.

Hard copies of documents containing personal information that are kept at our offices are securely stored and only made available to employees who need to know the information to provide you with our services. We maintain physical, electronic, and procedural safeguards to guard your personal information.

We do not share your personal information with companies that perform marketing services.

Your relationships and trust have always been important to us. Please be assured that we will abide by our policies and procedures to protect your information.

Should you have any questions regarding Gray Equity Management, LLC's Privacy Policy, please do not hesitate to contact us at 781-407-0300.

April 22, 2019