

NEW ENGLAND CAPITAL

Privacy Policy

At NEW ENGLAND CAPITAL we recognize that your relationship with us is based on trust and the expectation that we will always act in your best interests. Because you have entrusted us with the management of a portion of your assets, we take very seriously our obligation to protect and safeguard the privacy of your personal and financial information. What follows is the current privacy policy of NEW ENGLAND CAPITAL.

I. Information We Collect

We collect nonpublic personal information from you, as well as from other sources. The sources and the information collected may include:

- Information you provide to us, to our affiliated entities, or on applications and related forms and even our website, and may include your telephone numbers, social security or tax identification number, birth date, net worth, assets, and income.
- Information regarding your transaction history with us, such as products or services purchased, account balances, trading history, and payment history, as well as information from our clearing firm and/or its information service providers which may include information such as your credit relationships with unaffiliated third parties.
- Information from other unaffiliated third parties, including employers, associations, benefit plan sponsors, and other institutions, if you transfer positions or funds to the firm.
- Similarly, in the course of doing business with you, we collect nonpublic personal information about you, for example:
 - Information we receive from you on applications, profiles, or other forms such as social security number, driver's license number, income, occupation and birth date; and
 - Information about your investments with others (account numbers and balances, past transactions), beneficiary information, estate plans, and tax information.

II. Disclosure of Information to Nonaffiliated Third Parties

We do not sell, share or disclose your personal information to marketing companies.

We do not disclose any nonpublic personal information about our clients or former clients to any nonaffiliated third parties, except as permitted or required by law. We may disclose any of the nonpublic personal information that we collect about you, as required to conduct our business and as permitted or required by law. We may share information about our customers with our affiliated Broker/Dealer and/or with unaffiliated financial or nonfinancial services providers, such as insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing account maintenance or customer service to your account(s). We also may share your information with regulators and law enforcement organizations or in response to a subpoena or discovery request, as permitted or required by law.

We do not sell, share, or disclose your nonpublic personal information to unaffiliated third-party marketing companies.

A. Opting In.

If you live in an “opt-in” state, where we are required to obtain your affirmative consent to share your nonpublic personal information with unaffiliated third parties who do not currently assist us in servicing your account, we will obtain your consent before we allow any representative that serviced your account(s) to take your non-public personal information with them in the event they leave the firm. **You can withdraw your consent at any time by contacting** our operations department at (800) 332-9558.

B. Opting Out.

If you live in an “opt-out” state and do not want any person that serviced your account(s) to take your non-public personal information with them if they leave the firm, you have the right to opt out of such disclosure. If you have a joint account, we will treat an opt-out direction by any one joint customer as applying to all associated joint customers. If you wish to opt out, now or at any time in the future, you do so by contacting our operations department at (800) 332-9558.

III. Ending Your Relationship With Us.

If you move your account from the firm or otherwise cease any business dealings with the firm, we will not treat your personal financial information any differently. All such information is treated in accordance with this Privacy Notice. If you notify us in writing that you want us to treat your personal information differently than that set forth in this privacy notice, we will honor your request.

IV. Your Right to Access and Correct Your Information.

You have the right to see and copy the personal information we have collected about you in person or you may contact us and request a copy of the information. If you believe that information we have collected is incorrect or incomplete, you have the right to request that we complete or correct the disputed information.

We will either make the requested change or explain to you in writing why we are unwilling or unable to make the requested change. If we do not change or complete the information, you may file a written statement of dispute with the firm, and we will include your written dispute in any future disclosure of personal information. We will also send your written statement of dispute to any one you ask who received your personal information.

V. Safeguarding privacy

We recognize the importance of preventing unauthorized access to the personal information we collect about you, including information held in electronic format. The firm allows access to your nonpublic personal information only to employees servicing your accounts and managing our operations. We maintain electronic and contractual safeguards to insure we abide by our policy and applicable law. We also train our employees in the proper handling of sensitive information.

VI. Questions

If you have any questions concerning our handling of your personal information, you may contact our Compliance Officer by telephone or in writing at 120 King Street, Northampton, MA 01060 (413) 584-9121 Toll Free (800) 332-9558 Fax (413) 585-5748