



**GENERATION**  
Capital Management

## PRIVACY PLEDGE

### MARCH 2024

**We would like to share with you our policies regarding privacy. This pledge explains our policies. Please read carefully.**

Generation Capital Management LLC ("GCM") is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest of confidence. These records include all personal information that we collect from you in connection with any of the services provided by GCM. We do not disclose information to nonaffiliated third parties, except as permitted by law and we do not anticipate doing so in the future. If our Privacy Pledge changes, we are required by law to provide our clients with the new Privacy Pledge and give you the opportunity to opt-out, before the new policy becomes effective.

#### **Information We Collect**

We collect and use nonpublic personal information about you to conduct our business and to provide you with superior service. The information we collect about you may come from any or all of the following sources

- From you, on applications, other forms, and other communications with us. This information may include your name, address, social security number, assets, liabilities, and income.
- As a result of your transactions with us, with our affiliates, and with other business.
- From providers of services to us, such as clearing banks, brokers, and consumer reporting agencies.

#### **A Note About Security**

We understand that the security of your personal information is very important to you, and we are committed to protecting your information. Our policy is to grant access to your information only to those employees who need to know that information to provide business and professional services to you, and only to nonaffiliated parties as permitted by law (see information sharing permitted by law). We also maintain physical, electronic, and procedural safeguards to guard your personal information from unreasonable risk. We do not provide your personal information to mailing list vendors or solicitors for any purpose.

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#### **Information Sharing Permitted by Law**

We may share any and all of the information we collect about you with companies that perform clearing, accounting, or other services on our behalf. We require strict confidentiality in our agreements with them and expect them to keep this information private.

In addition, we may share any and all information we collect about you with government entities and regulators in response to a subpoena or other regulatory requirement.

#### **Record Retention**

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by Federal and State securities laws. After this required period of record retention, all such information will be destroyed.

#### **Other Important Information**

Federal law requires us to provide you with an annual privacy notice as long as you remain a client of ours. Please note that you will no longer receive annual Privacy Pledges once you cease to be a client of ours.