

FACTS

WHAT DOES GUZMAN & COMPANY DO WITH YOUR PERSONAL INFORMATION?



Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and employment information
- Account balances and transaction history
- Assets and investment experience

How? All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Guzman & Company chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Guzman & Company share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — With service providers we use to offer our products and services to you (please see below to limit the way we contact you)	Yes	No
For joint marketing with other financial companies	No	No
For our affiliates’ everyday business purposes — information about your transactions and experiences	Yes	Yes
For our affiliates’ everyday business purposes — information about your creditworthiness	Yes	Yes
For affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	Yes

To limit our sharing

- Call 305.374.3600—our menu will prompt you through your choices
- Visit us online: guzman.com/compliance
- Talk to your assigned account representative

Please note: If you are a **new** customer, we can begin sharing your information 30 days from the date we sent this notice. When you are **no longer** our customer, we continue to share you information as described in this notice. However, you can contact us at any time to limit our sharing.

To limit direct marketing contact

- Call 305.374.3600—our menu will prompt you through your choices
- Visit us online: guzman.com/compliance
- Talk to your assigned account representative
- **Please note:** Direct marketing is email, postal mail and telephone marketing, your telephone and postal mail opt-out choices will last for five years, subject to applicable law. Even if you limit direct marketing, we may still contact you to service your account or as otherwise allowed by law.

Questions? Call 305.374.3600, go to guzman.com/compliance or email: compliance@guzman.com

What do we do?

How does Guzman & Company protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. For more information contact us at compliance@guzman.com .
How does Guzman & Company collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> ▪ Open an account or perform transactions ▪ Seek advice about your investments We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit some but not all sharing related to: <ul style="list-style-type: none"> ▪ Affiliates' everyday business purposes—information about your creditworthiness ▪ Affiliates from using your information to market to you ▪ Nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See <i>Other important information</i> section for your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	If you have a joint account, your choice(s) will apply to everyone on your account.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Our affiliates include companies that utilize the names: Guzman Inc., Guzman & Company, Guzman Energy, Guzman Financial Engineering, Aragon Galiano Holdings, and Ecesis Advisory LLC
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Nonaffiliates we share with can include financial services companies such as clearing firms, broker-dealers, and exchanges.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ Our joint marketing partners include financial services companies

Other important information

Do Not Call Policy. This notice is the Guzman & Company Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via telephone numbers listed on the state or federal Do Not Call lists, unless the law allows. Guzman & Company employees receive training on how to document and process telephone marketing choices. Consumers who ask not to receive telephone solicitations from Guzman & Company will be placed on the Guzman & Company Do Not Call list and will not be called in any future campaigns, including those of Guzman & Company affiliates. If you communicate with us by telephone, we may monitor or record the call.

California: Under California law, we will not share information we collect about you with companies outside of Guzman & Company, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law.

Guzman Inc. U.S. Legal entities

Guzman Inc. legal entities that utilize the names: Guzman Inc., Guzman & Company, Guzman Energy, Guzman Financial Engineering, Aragon Galiano Holdings, or Ecesis Advisory LLC