



Gyroscope Capital Management Group  
999 Vanderbilt Beach Road  
Suite 102  
Naples, Florida 34108

V: 866.459.9998

F: 239.790.0928

MJEgan@MoorsCabot.com

## **Privacy Policy**

Gyroscope Capital Management Group, LLC (“Gyroscope Capital”) is an investment advisor providing wealth management products and services to our clients. As a firm, we have always valued the trust our clients have placed in us and are committed to the responsible management, use, and protection of their personal information. This Notice applies to Gyroscope Capital, its subsidiaries and affiliates and describes not only the personal information we collect, but also how we handle and protect it. As part of our normal business practices, we distribute our policy annually or when significant changes are made to it.

### **Collecting Information**

Gyroscope Capital Management Group, LLC collects personal information about you to help us serve your financial needs, process transactions in your account(s), provide customer service, and fulfill legal and regulatory requirements.

Gyroscope Capital collects nonpublic information from you, as well as from other sources. The sources and the information collected may include:

Information you provide to us on applications and related forms, or through discussions with our customer service staff, such as address, social security number, birth date, net worth, assets, and income.

Information regarding your investment history with us, such as products or services purchased, account balances, trading history, and payment history, as well as information from information service companies and consumer reporting agencies, such as your transactions or credit relationships with unaffiliated third parties

Information from other unaffiliated third parties, including employers, associations, benefit plan sponsors, and other institutions.

### **Sharing Your Information**

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 clients with insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, custodians, account reporting services and other third parties who assist us in providing you with account maintenance and/or customer service. 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.

### **Safeguarding Your Privacy**

Gyroscope Capital recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Gyroscope Capital authorizes access to your nonpublic information only to personnel who need that information to serve you. We maintain, physical, electronic, and procedural safeguards regarding your nonpublic personal information to ensure that we comply with



**GYROSCOPE CAPITAL**  
— MANAGEMENT GROUP —

our own policy, industry practices, and federal and state regulations. If you decide to close your account(s), we will adhere to the privacy policies and practices as described in this notice.

**Opt Out Provision**

If you wish to opt out of these disclosures, now or at any time in the future, please contact our Compliance department at 1-800-426-0501. However, please note that if you direct us not share your personal information with our affiliated financial services providers, we may still share your personal information to the extent permitted by law to process transactions and/or to service your accounts. If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers.

**SPECIAL NOTICE TO RESIDENTS OF MASSACHUSETTS**

*The following section supplements our Policy with respect to our individual clients who have a Massachusetts address and supersedes anything to the contrary in the above Policy with respect to those clients only.*

The state of Massachusetts requires financial institutions to obtain your consent prior to sharing personal information that they collect about you with nonaffiliated third parties, or eligibility information with affiliated companies, other than in certain limited circumstances. Except as permitted by law, we will not share personal information we collect about you with nonaffiliated third parties, or eligibility information with affiliated companies, unless you provide us with your written consent to share such information.

**SPECIAL NOTICE TO RESIDENTS OF VERMONT**

*The following section supplements our Policy with respect to our individual clients who have a Vermont address and supersedes anything to the contrary in the above Policy with respect to those clients only.*

The state of Vermont requires financial institutions to obtain your consent prior to sharing personal information that they collect about you with nonaffiliated third parties, or eligibility information with affiliated companies, other than in certain limited circumstances. Except as permitted by law, we will not share personal information we collect about you with nonaffiliated third parties, or eligibility information with affiliated companies, unless you provide us with your written consent to share such information.

**SPECIAL NOTICE TO RESIDENTS OF CALIFORNIA**

*The following section supplements our Policy with respect to our individual clients who have a California address and supersedes anything to the contrary in the above Policy with respect to those clients only.*

In response to a California law, if your account has a California home address, your personal information will not be disclosed to nonaffiliated third parties except as permitted by applicable California law, and we will limit sharing such personal information with our affiliates to comply with California privacy laws that apply to us.

**Questions**

If you have any questions after reading this privacy policy, we encourage you to contact us or to write to Privacy Management, c/o Compliance Department, Gyroscope Capital One Federal Street, 19<sup>th</sup> Floor, Boston, MA 02110.