



Saratoga Investment Solutions, Inc.

Privacy Policy

Effective: April 2021

Our Commitment to You

As a client of **Saratoga Investment Solutions Inc.**, you share both personal and financial information with us. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Saratoga Investment Solutions (“SIS”, “We” or “Us”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Financial Planner, as described here in our Privacy Policy (“Policy”).

Our Privacy Policy

Saratoga Investment Solutions does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients, whether in our intake forms, custodial forms, or through software on-boarding tools:

- Personal information regarding our clients’ identity such as name, address and social security number
- Beneficiary and family names, addresses, and birthdates
- Assets and Liabilities
- Income and Expenses
- Email address(es)
- Investment Activity and Account information
- Investment experience and goals



- Tax Returns and other Tax Documents
- Estate Planning Documents
- Insurance and Benefit Documents and Information
- Employer sponsored benefits
- Credit Report Information

How we protect information

Our employees and affiliated persons are required to protect the confidentiality of information and to comply with our policies. They may access information only when there is an acceptable reason to do so, such as to set up a new account, service your existing account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We take your privacy and data security very seriously and thus have put into place physical, electronic, and procedural safeguards to protect your information. All our practices both meet and exceed the applicable SEC, state, and federal laws.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and state laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

How do we share your information?

Saratoga Investment Solutions shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.



Basis for Sharing	Do we share?	Can you limit?
<p>Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, including but not limited to: processing transactions, general account maintenance, responding to regulators or legal investigations, and credit reporting.</p>	Yes	No
<p>Communicating with Client Team SIS may be required to communicate with a client's listed contacts in order to obtain or share any personal information with the acceptable reason.</p>	Yes, with approval	Yes
<p>Marketing Purposes SIS does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where SIS or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	No	Not Shared
<p>Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).</p>	Yes	Yes
<p>Information About Former Clients SIS does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>	No	Not Shared



Client Notifications

We are required by law to annually provide a notice describing our privacy policy. In addition, we will inform you promptly if there are changes to our policy.

Please do not hesitate to contact us with any questions regarding our policy.