

Privacy Policy

February 9, 2026

Our Commitment to You

Breakwater Financial, LLC (“Breakwater” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

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. Breakwater (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Breakwater 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, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

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.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA 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?
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, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Breakwater 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 Breakwater 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.	No	Not Shared
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).	Yes	Yes
Information About Former Clients Breakwater 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.	No	Not Shared

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Opt-Out Rights

We do not share nonpublic personal information with third parties in a manner that would require an opt-out under Regulation S-P. Therefore, clients are not offered an opt-out option.

SMS Privacy Policy

Breakwater is committed to protecting your privacy. This SMS Privacy Policy explains how we collect, use, disclose, and safeguard your information when you opt in to receive SMS messages from us.

Information We Collect

When you opt into our SMS program, we may collect the following information:

Breakwater Financial, LLC

- Your phone number
- Any other information you provide to us through SMS.

How We Use Your Information

We use the information we collect to:

- Send you SMS messages related to our services, events, and updates.
- Respond to your inquiries and provide customer support.

Data Sharing

We do not sell or rent your personal information to third parties. However, we may share your information with trusted service providers, such as SMS delivery platforms.

Your Rights

You have the right to access, update, or delete your personal information by contacting us directly. If you wish to exercise these rights, please email us at info@breakwaterfinancial.com

- Opt in to receiving SMS messages from us at any time by texting “START” after receiving the first text from Breakwater.
- Opt out of receiving SMS messages from us at any time by replying “STOP” to any message you receive.
- For assistance when communicating with us using SMS, reply “HELP” to any message you receive or call (617) 849-8019.

Data Security

We use industry-standard security measures to protect your personal information. We implement appropriate technical and organizational measures to protect your information from unauthorized access, use, or disclosure.

Changes to This Policy

We may update this SMS Privacy Policy from time to time. We will notify you of any changes by posting the new policy on our website and updating the effective date.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (617) 849-8019 or by email at info@breakwaterfinancial.com.