High Falls ADVISORS
Your Trusted Financial Guides

Privacy Policy Notice

Purpose of this Notice

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a nonaffiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you with this document, which notifies you of the privacy policies and practices of High Falls Advisors, Inc.

Information We Collect

We may collect "nonpublic personal information" about you from the following sources:

- Information we receive from you such as on applications, documents, or other forms;
- Information about your transactions we secure from our files, our affiliates or from others;
- Information we receive from third parties, such as a consumer reporting agency;
- Information we receive from others involved in your transactions, such as accountants and attorneys.

Information We Disclose

We may disclose any of the above information that we collect about our clients or former clients to our affiliates or to nonaffiliated third parties as permitted by law.

WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION ABOUT YOU TO ANYONE FOR ANY PURPOSE THAT IS NOT SPECIFICALLY PERMITTED BY LAW.

If you decide to become an inactive client, we will adhere to the privacy policies and practices as described in this notice.

Our Security Procedures

We restrict access to nonpublic information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

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Securities offered through Leigh Baldwin & Co., LLC Member: FINRA SIPC
Accounts carried by: National Financial Services, LLC Member: NYSE