# **Privacy Policy**



## Our Commitment to You

Cutter Financial Group LLC ("Cutter Financial" 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. Cutter Financial (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. Cutter Financial 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?

Driver's license number	Date of birth	
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 so 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.

#### **Text Messages**

Cutter Financial Group collects a verbal opt-in from Clients prior to communicating by text. Clients will be able to opt in either in person, by phone or during a video meeting. When a Client is registered for the first time, they will be asked to provide a phone number and if they would like to opt in to SMS-based billing notifications. They will be verbally informed that "Message and data rates may apply", "Message frequency may vary", and they can "text HELP for support or more information and STOP to unsubscribe at any time." They will also be informed that their phone number will not be shared

with third parties for marketing or promotional purposes. Consumer-Initiated Messaging: By starting a text conversation with Cutter Financial Group you are agreeing to receive conversational messages from Cutter Financial Group. Msg & data rates may apply. Msg frequency varies. Unsubscribe at any time by replying STOP.

### **Basis for Sharing**

<b>Servicing our Clients -</b> We share non-public personal information with affiliated and non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, consultants, legal counsel, and 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.		Can you limit?
		No
Marketing Purposes - Cutter Financial Group 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 Cutter Financial Group 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
<b>Authorized Users -</b> 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
<b>Information About Former Clients -</b> Cutter Financial 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

#### **Massachusetts specific Regulation**

In response to Massachusetts law, the Client must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client's execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.

### Information for California, North Dakota, Virginia and Vermont Customers

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

#### **Changes to our Privacy Policy**

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.

#### **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 (508) 388-7175 or <a href="mailto:info@cutterfinancialgroup.com">info@cutterfinancialgroup.com</a>.

