



# PRIVACY POLICY

www.greenstaradvisors.com



GreenStar Advisors treat your nonpublic personal financial information with confidentiality and respect. Our Privacy Policy defines the trust, privacy, and confidentiality we have with our Clients. Our Privacy Policy is reasonably designed to:

1. Ensure the security and confidentiality of Client records and information;

 Protect against anticipated threats or hazards to the security or integrity of Client records and information; and,
 Protect against unauthorized access to or use of Client records or information that could result in substantial harm or inconvenience to Clients.

#### **Information We Collect About You**

You typically provide personal information when you open an account with us. This information includes financial and tax identification information, to comply with U.S. government laws and rules, as well as rules imposed by regulatory organizations and jurisdictions.

We request personal information from new customers as well as from customers who have had long-standing relationships with us. Your advisor must have a reasonable basis for believing that the recommendation is suitable for you. In making this assessment, your advisor must consider your risk tolerance, other security holdings, financial situation (income and net worth), financial needs and investment objectives.

#### The Use of Website "Cookies"

Cookies, pixel tags and similar technologies (collectively "cookies") are files containing small amounts of information which are downloaded to any internet enabled device – such as your computer, smartphone, or tablet – when you visit a website. We use cookies to make our website easier to use, to deliver a personalized experience, and to better tailor our content to your interests and needs. Cookies are used to help speed up your future activities and your experience with GreenStar Advisors.

On our website **www.greenstaradvisors.com** we use cookies to personalize content and marketing, to provide social media features, and to analyze our traffic. We also share information about your use of our site with our social media, advertising, marketing, and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services. You consent to our cookies if you continue to use our website.

If you provide information to us through our website, it should be assumed that this information is collected by us and used for business purposes. The website may contain tools, surveys, questionnaires, quizzes, calculators, or other such things that engage visitors. To use these tools, it may ask you to enter personal information. You should only do this through a secure connection. Our website collects all information that you provide to us and combines it with cookies, online advertising pixels, your IP Address, and other available information to help inform our marketing, sales, and servicing decisions.

#### There are many ways to manage your cookies:

- You can refuse consent
- You can disable GreenStar Advisors or third-party cookies by use of your browser settings

## The cookies used may be generally categorized:

**1. Necessary Cookies** – These cookies do not identify you as an individual.

2. Performance Cookies – These cookies do not identify you as an individual.

**3. Functionality Cookies** – The information these cookies collect may include personal data that you have disclosed.

**4. Targeting or Advertising Cookies** – Most types of these cookies track consumers via their Device ID or IP address therefore they may collect personal data.

**5. Third-Party Cookies** – Based on the type of cookies used by the relevant third-party, the information these cookies collect may include personal data.

#### Responsibility to Protect Non-Public Personal Information

Our Associated Persons are accountable for protecting confidential Client information in which they have access. We restrict access to your non-public personal information to those persons on a need to know basis. Nonpublic personal information includes all information you provide to obtain a financial product or service. It also includes information resulting from any transaction or information



otherwise obtained in providing a financial product or services. Also, we maintain physical, procedural and electronic safeguards to protect the information from access by unauthorized parties.

#### **Privacy on the Internet**

We are committed to preserving your privacy on the Internet. If you contact us via email, we will use email information only for the specific purpose of responding to requests or comments. We prohibit the sale of email addresses. Only when required by law will we share email addresses and information.

We guard Client information by the use of heightened Internet security risk programs, systems, and monitoring devices. We to protect Client accounts and our IT systems by the use of physical and electronic safeguards established to protect private information from being intercepted over the Internet.

We maintain the safety of information transmitted electronically from unauthorized access, by the use of various forms of transmission encryption, firewall obstacles, and authentication procedures (as applicable).

#### **Sharing Information**

We do not sell lists of Client information. We do not disclose Client information to marketing companies unless we hire them to provide specific services as listed below. We do not disclose any non-public personal information except as provided by law. We will share non-public personal information with our affiliates while processing transactions, managing accounts on your behalf, or to inform you of updates, products, or services that we believe would be of interest to you. We may also disclose it for gift giving purposes.

### We can share non-public personal information with the following types of third parties:

(a) our financial service providers, such as custodians, transfer agents, technology developers;

(b) non-financial companies under servicing or joint marketing agreements, such as printing firms, mailing firms, or providing service firms data transfer information for the purpose of aggregation, financial planning, billing, automations, online tools, online calculators, corporate gifting, transmitions through various application programming interfaces (APIs), contact relationship management, compliance, or performance reports.

These third parties are bound by law or by contract to use your information only for the services for which we hired them and are not permitted to use or share this information for any other purpose.

Your non-public personal information can also be disclosed to persons we believe to be your authorized agent or representative. We are also required to disclose your information to various regulatory agencies to satisfy our regulatory obligations and as otherwise required or permitted by law. Also, we will disclose Client information to third-party litigants when we are required to do so by lawful judicial process or by court order. We can also disclose your confidential information in response to a request from a government authority that has jurisdiction over our affairs.

#### **Former Customers**

We do not disclose any non-public personal information about our former Clients to anyone, except as required by law.

#### **Keeping You Informed**

We will send you a copy of our Privacy Policy annually for as long as you maintain a relationship with us. We will provide you with a revised policy if we make any material changes. We will not change the policy to permit the sharing of non-public personal information other than that provided in this notice unless we first notify you and allow you the opportunity to "opt out" or prevent information sharing.



FACTS	WHAT DOES GREENSTAR ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<ul> <li>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</li> <li>Social Security number and employment information</li> <li>Account balances and account transactions</li> <li>Transaction history and wire transfer instructions</li> <li>When you are no longer our customer, we continue to share your information as described in this notice.</li> </ul>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers ' personal information; the reasons GreenStar Advisors, LLC chooses to share; and whether you can limit this sharing.	

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES GREENSTAR ADVISORS, LLC SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes - (i.e. to process your transactions, maintain your account(s), respond to court orders and legal investigations or report to credit bureaus)	Yes	No
For our marketing purposes - (i.e. to offer our products and services to you)	Yes	No
For joint marketing w/other financial firms -	No	We do not share
For our affiliates' everyday business purposes -(i.e. information about your transactions)	Yes	No
For our affiliates' everyday business purposes - (i.e. information about your creditworthiness)	No	We do not share
For our affiliates to market to you -	No	We do not share
For nonaffiliates to market to you -	No	We do not share
QUESTIONS? Call 303-785-3838 or go	to www.greenstaradvisors.com	



WHAT WE DO	
How does GreenStar Advisors, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. files and buildings.
How does GreenStar Advisors, LLC collect my personal information?	<ul> <li>We collect your personal information, for example, when you:</li> <li>open an account</li> <li>provide account information</li> <li>give us your contact information</li> <li>enter into an investment advisory contract</li> <li>tell us about your investments or retirement portfolio</li> <li>seek advice about your investments</li> <li>visit our website</li> <li>use our online tools</li> </ul>
Why can't I limit all sharing?	<ul> <li>Federal law gives you the right to limit only:</li> <li>sharing for affiliates' everyday business purposes (i.e. information about your creditworthiness)</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing.</li> </ul>

WHAT WE DO	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • GreenStar Advisors, LLC does not share with affiliates.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • GreenStar Advisors, LLC does not share with nonaffiliates so they can market to you.
Joint Marketing	<ul> <li>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</li> <li>GreenStar Advisors, LLC does not have joint marketing arrangements.</li> </ul>



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