

PRIVACY NOTICE

APRIL 2020

FACTS

What does Twin Focus Capital Partners, LLC (“TwinFocus”) do with your personal information?

WHY?

Financial companies choose how they share your personal information. Federal law provides consumers the right to limit some, but not all, sharing. Federal law also requires TwinFocus to tell you how our firm collects, shares, and protects your personal information. Please read this notice carefully to understand what we do.

WHAT?

The types of personal information TwinFocus collects and shares depends on the product or service you have with our firm. This information may include:

- Social Security numbers and identifying information, including date of birth, address, phone numbers, and e-mail;
- Custodial accounts and account holdings, balances, family composition, and background; and
- Security transactions, investment objectives, net worth, and payment history

HOW?

All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients’ personal information; the reasons TwinFocus chooses to share this personal information; and whether you can limit our firm’s ability to share.

REASONS TWINFOCUS MAY SHARE YOUR PERSONAL INFORMATION	DOES TWINFOCUS SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes – such as 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 – to offer our products and services to you	YES	NO
For joint marketing with other financial companies	NO	N/A
For our affiliates' everyday business purposes – information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes – information about your creditworthiness	YES	NO
For our affiliates to market to you	NO	N/A
For nonaffiliates to market to you	NO	N/A

QUESTIONS?Call (617) 720-4500 or please visit www.TwinFocus.com

WHO WE ARE

Who is providing this notice?

Twin Focus Capital Partners, LLC (“TwinFocus”)

WHAT WE DO

How does TwinFocus protect my personal information?

To protect your personal information from unauthorized access and use, our firm utilizes security measures that comply with federal law. These measures include computer safeguards and secured files and offices.

TwinFocus restricts access to your non-public personal information to only those employees who need that information to properly service your account.

How does TwinFocus collect my personal information?

Our firm collects your personal information, from you or from other companies, for example, when you:

- Enter into an investment advisory contract with TwinFocus or open a custodial/brokerage account;
- Communicate with our firm or transact in securities
- Deposit or withdraw funds, provide or update your investment profile
- Instruct your custodian or bank to provide the firm with copies of statements or otherwise grant us access to them.

DEFINITIONS

Companies related by common ownership and control. They can be financial and nonfinancial companies. The following are affiliates of TwinFocus:

Affiliates

- TF Realty Partners, LLC
- TFSO Partners, LLC
- TwinFocus, LTD.
- TFSO Partners, LLC
- TF Managers, LLC
- TF Global Partners, LLC
- Tridelphia Partners, LLC
- TF Special Opportunities – Glory, LLC
- TF Special Opportunities – PPR, LLC
- TF Special Opportunities – PPR, Series II, LLC
- TF Special Opportunities – Salvera, LLC
- TF Realty Partners – 322W, LLC
- TF Okeana Partners, LLC
- TFRP QOF Aria 2019, LLC
- TFRP QOF Streamline Emerald 2019, LLC
- TFRP QOF Streamline Front 2019, LLC
- TFRP QOF UTK 2019, LLC
- TFRP QOF WCU 2019, LLC
- TFRP QOF BWS 2020, LLC
- TFRP QOF VCU 2020, LLC

Nonaffiliates

Companies not related by common ownership and control. They can be financial or nonfinancial companies.

- TwinFocus does not share with nonaffiliates so that they can market to you.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or service to you.

- TwinFocus does not jointly market.