



Part 2B of SEC Form ADV Required Brochure Supplement for

Twin Focus Capital Partners, LLC
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The professional staff of TwinFocus Capital Partners (“TwinFocus” or “the firm”) are evaluated on the basis of education and professional work experience prior to hiring. The firm encourages all full-time employees complete a college degree. In addition, any associated persons involved in determining investment strategy or giving investment advice to clients must meet the examination or other licensing requirements of the states in which they provide services. The firm conducts pre-hiring background checks for all employees.

This brochure supplement provides information about the qualifications of the above named TwinFocus Capital Partners investment advisory professionals. This is a supplement to the TwinFocus Capital Partners Disclosure Brochure (Form ADV, Part 2A) for which you should have already received notification. Please contact Paul Karger, the firm’s Chief Compliance Officer, at +1 (617) 720-4500 or via email to pk@twinfocus.com if you have any questions about this supplement.



Wesley Karger, CFA®

Co-Founder & Managing Partner

Education:

- Boston University | B.A., Economics (Cum Laude) | 2000

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Partner | June 2006 – Present
- UBS Financial Services Inc. | Financial Advisor | September 2003 – June 2006
- State Street Bank | Analyst | February 2000 – August 2003

Professional Designations

- CFA®

Born:

- 1977

Contact Information

- Phone: +1 (617) 720-4512
- Email: wk@twinfocus.com

Wesley is directly supervised by Paul Karger

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Paul Karger, CFA®

Co-Founder & Managing Partner

Education:

- Boston University | B.S., Manufacturing | 2000

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Partner | June 2006 – Present
- UBS Financial Services Inc. | Vice President | September 1999 – June 2006

Professional Designations

- CFA
- CIMA®

Born:

- 1977

Contact Information

- Phone: +1 (617) 720-4515
- Email: pk@twinfocus.com

Paul is directly supervised by Wesley Karger

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



John Pantekidis, JD, CFA®

Managing Partner, CIO, & General Counsel

Education:

- Boston University | LL.M., Law | 1994
- Boston University | JD., Law | 1993
- Boston University | B.A., Economics | 1990

Recent Business Background:

- Twin Focus Capital Partners, LLC | Partner, CIO & General Counsel | January 2007 – Present
- A.G. Edwards & Sons, Inc. | Financial Consultant | November 2003 – December 2006

Professional Designations

- CFA®

Born:

- 1967

Contact Information

- Phone: +1 (617) 720-4517
- Email: jp@twinfocus.com

John is directly supervised by Paul Karger

John Pantekidis is a licensed attorney admitted to the Bar of the Commonwealth of Massachusetts. He does not provide legal services in this capacity to the firm's investment advisory clients and, as such, no conflicts of interest exist under the circumstances.

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Laurence J.S. Grosbaum, CPA, CFA®

Partner & Managing Director, Portfolio Management, Analytics, and Reporting

Education:

- State University of New York at Buffalo | B.S., Business Administration | 1991

Recent Business Background:

- Twin Focus Capital Partners, LLC | Sr. Director, Portfolio Advisory | June 2010 – Present
- Reed & Associates, CPAs | Senior Manager | February 2010 – June 2010
- State Street Corporation | Vice President | September 2006 – December 2008
- Grant Thornton | Senior Manager | January 2006 – September 2006

Professional Designations

- CPA
- CFA®

Born:

- 1969

Contact Information

- Phone: +1 (617) 720-4525
- Email: laurence.grosbaum@twinfocus.com

Laurence is directly supervised by Wesley Karger

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Patrick Harney, CFP®, CISP®

Partner & Managing Director, Client Advisory

Education:

- Gettysburg College | B.A., Philosophy | 2001

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Director, Client Advisory | May 2013 – Present
- PNC Bank | Asst. Vice President & Trust Officer | October 2008 – April 2013

Professional Designations

- CFP®
- CISP®

Born:

- 1977

Contact Information

- Phone: +1 (617) 720-4536
- Email: patrick.harney@twinfocus.com

Patrick is directly supervised by Paul Karger

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Jeffrey Heisler, PhD, CFA®

Partner & Managing Director, Investment Research

Education:

- New York University | PhD, Finance | 1995
- University of Chicago | MBA, Finance | 1986
- Union College | B.S., Mechanical Engineering | 1981

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Director, Investment Research | March 2014 – Present
- The Colony Group | Market Strategist | February 2011 – February 2014
- Venus Capital Management | Chief Risk Officer | May 2009 – February 2011

Professional Designations

- CFA®

Born:

- 1959

Contact Information

- Phone: +1 (617) 720-4534
- Email: jeffrey.heisler@twinfocus.com

Jeffrey is directly supervised by Paul Karger

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Peter Gnall, CFP®, MST

Senior Director, Client Advisory

Education:

- Bentley University, Elkin B. McCallum Graduate School of Business | MST | 2014
- Binghamton University | BS, Financial Economics | 2007

Recent Business Background:

- TwinFocus Capital Partners, LLC | Director, Client Advisory | April 2015 – Present
- Riverview Capital Advisers | Private Wealth Adviser | July 2010 – April 2015
- Adviser Investments | Relationship Manager | April 2005 – July 2010
- American Express Financial Advisers | Financial Advisor | February 2004 – April 2005

Professional Designations

- CFP®
- Series 66

Born:

- 1979

Contact Information

- Phone: +1 (617) 720-4540
- Email: peter.gnall@twinfocus.com

Peter is directly supervised by Paul Karger

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Michael Gibbons, CFA®, CFP®

Director, Portfolio Management, Analytics, and Reporting

Education:

- Skidmore College | B.S., Management & Business (Minor in Economics) | 2009

Recent Business Background:

- Twin Focus Capital Partners, LLC | Portfolio Analyst | April 2015 – Present
- State Street Global Advisors | Client Implementation Officer | June 2014 – April 2015
- State Street Global Advisors | Senior Associate | November 2011 – June 2014

Professional Designations

- CFA®
- CFP®
- Series 65

Born:

- 1986

Contact Information

- Phone: +1 (617) 720-4518
- Email: michael.gibbons@twinfocus.com

Michael is directly supervised by Laurence Grosbaum

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Ana Rabines, CFA®

Director, Portfolio Management, Analytics, and Reporting

Education:

- Boston College | M.S., Finance | 1997
- Suffolk University | B.S., Business Administration | 1996

Recent Business Background:

- Twin Focus Capital Partners, LLC | Associate Director, Portfolio Management, Analytics and Reporting | March 2021 – Present
- CIBC Private Wealth Management | GIPS Compliance & Performance Analysis Consultant | March 2020 – August 2020

Professional Designations

- CFA®

Born:

- 1968

Contact Information

- Phone: +1 (617) 720-4527
- Email: ana.rabines@twinfocus.com

Ana is directly supervised by Laurence Grosbaum

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Savannah Campbell

Associate Director, Investment Research

Education:

- Rensselaer Polytechnic Institute | M.S., Financial Engineering & Risk Analytics | 2014
- State University of New York at Geneseo | B.A., Economics | 2013

Recent Business Background:

- Twin Focus Capital Partners, LLC | Analyst, Portfolio Advisory Group | March 2016 – Present
- The Ayco Company, L.P. | Financial Analyst | July 2014 – February 2016

Professional Designations

- Series 65

Born:

- 1991

Contact Information

- Phone: +1 (617) 720-4513
- Email: savannah.campbell@twinfocus.com

Savannah is directly supervised by Jeffrey Heisler

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Dimitrios Kyranos

Associate Director, Investment Research

Education:

- Boston University | B.S. Business Administration (Finance Concentration) | January 2017

Recent Business Background:

- Twin Focus Capital Partners, LLC | Analyst, Portfolio Advisory | February 2018 – Present
- ALPS Alternative Investment Services | Portfolio Accountant and Administrator | January 2017 – February 2018

Professional Designations

- Series 65

Born:

- 1993

Contact Information

- Phone: +1 (617) 720-4559
- Email: dimitrios.kyranos@twinfocus.com

Dimitrios is directly supervised by Jeffrey Heisler

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Maya McDonald

Associate Director, Client Advisory

Education:

- Babson College | M.B.A. | December 2020
- Bucknell University | B.A., Psychology, Sociology | 2016

Recent Business Background:

- Twin Focus Capital Partners, LLC | Associate, Client Advisory | May 2019 – Present
- Morgan Stanley Wealth Management | Client Service Associate | July 2017 – May 2019
- Baystate Financial | Financial Advisor | January 2017 – June 2017

Professional Designations

- Series 7
- Series 63
- Series 66

Born:

- 1994

Contact Information

- Phone: +1 (617) 720-4516
- Email: maya.mcdonald@twinfocus.com

Maya is directly supervised by Patrick Harney

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Thomas Moore, CFP®

Associate Director, Client Advisory

Education:

- Bentley University | B.S., Economics-Finance | 2013

Recent Business Background:

- Twin Focus Capital Partners, LLC | Senior Associate, Client Advisory | December 2019 – Present
- Riverview Capital Advisors | Wealth Adviser | June 2019 – December 2019
- Yale Capital Advisors | Associate Adviser | September 2018 – May 2019
- New England Private Wealth Advisors | Financial Planner | September 2015 – April 2018
- The Ayco Company LP | Senior Analyst | July 2013 – August 2015

Professional Designations

- CFP

Born:

- 1990

Contact Information

- Phone: +1 (617) 720-4554
- Email: thomas.moore@twinfocus.com

Thomas is directly supervised by Patrick Harney

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Cameron Rahbar, CFP®

Associate Director, Client Advisory

Education:

- Wesleyan University | B.A., Economics | 2015

Recent Business Background:

- Twin Focus Capital Partners, LLC | Senior Associate, Client Advisory | December 2018 – Present
- Boston Private | Wealth Strategist Associate | September 2015 – December 2018

Professional Designations

- CFP

Born:

- 1992

Contact Information

- Phone: +1 (617) 720-4541
- Email: cameron.rahbar@twinfocus.com

Cameron is directly supervised by Patrick Harney

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Heather Canty

Senior Associate, Client Service

Education:

- Framingham State University | B.S., Business Administration (Marketing Concentration) | 2013

Recent Business Background:

- Twin Focus Capital Partners, LLC | Senior Associate, Client Service | June 2021 - Present
- Wells Fargo Asset Management | Associate Regional Director | April 2018 – March 2020
- Wells Fargo Investment Institute | Client Service Consultant | April 2017 – April 2018
- State Street Corporation | Business Analyst | January 2014 – January 2017
- Middlesex Savings Bank | Teller | May 2007 – January 2014

Professional Designations

- Series 65

Born:

- 1982

Contact Information

- Phone: +1 (617) 720-4551
- Email: heather.canty@twinfocus.com

Heather is directly supervised by Patrick Harney

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Andrew Gauthier

Senior Analyst, Portfolio Management, Analytics and Reporting

Education:

- University of Massachusetts Lowell | B.S. Business Administration with a Concentration in Finance and Accounting, with a Minor in Economics | 2017

Recent Business Background:

- Twin Focus Capital Partners, LLC | Analyst, Portfolio Advisory | March 2019 – Present
- BNY Mellon | Portfolio Accountant | June 2017 – March 2019

Professional Designations

- Series 65
- Candidate for CFA Level II

Born:

- 1995

Contact Information

- Phone: +1 (617) 720-4535
- Email: andrew.gauthier@twinfocus.com

Andrew is directly supervised by Laurence Grosbaum

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Forrestel Nugent

Senior Associate, Client Advisory

Education:

- Hobart and William Smith Colleges | B.A., Economics and Media & Society | 2015

Recent Business Background:

- Twin Focus Capital Partners, LLC | Senior Associate, Client Advisory | April 2021 – Present
- Style Analytics | Senior Client Analyst | January 2020 – April 2021
- First Republic Private Wealth Management | Registered Private Wealth Associate | April 2018 – January 2020
- Merrill Lynch | Registered Private Wealth Associate | October 2015 – April 2018
- Merrill Lynch | Seasonal Client Associate | March 2015 – October 2015
- Northwestern Mutual | Financial Representative Intern | May 2014 – March 2015

Professional Designations

- Series 7
- Series 66

Born:

- 1992

Contact Information

- Phone: +1 (617) 720-4545
- Email: forrestel.nugent@twinfocus.com

Forrestel is directly supervised by Patrick Harney.

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Allison Robinson

Senior Associate, Client Advisory

Education:

- University of New Hampshire | B.A., Psychology; Minor, Public Health | 2015

Recent Business Background:

- TwinFocus Capital Partners, LLC | Senior Associate, Client Advisory | October 2017 – Present
- Boston Children's Hospital | Outpatient Coordinator | June 2015 – October 2017

Professional Designations

- Series 65

Born:

- 1993

Contact Information

- Phone: +1 (617) 720-4556
- Email: allison.robinson@twinfocus.com

Allison is directly supervised by Patrick Harney

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Francesca Anselmo

Analyst, Portfolio Management, Analytics and Reporting

Education:

- University of New Hampshire | B.S., Finance | 2019

Recent Business Background:

- Twin Focus Capital Partners, LLC | Analyst, Portfolio Advisory | June 2019 – Present
- Rokit Solutions | Operations Intern | June 2018 – August 2018

Professional Designations

- Series 65

Born:

- 1997

Contact Information

- Phone: +1 (617) 720-2787
- Email: francesca.anselmo@twinfocus.com

Francesca is directly supervised by Laurence Grosbaum

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Cameron Iarrobino

Analyst, Portfolio Management, Analytics and Reporting

Education:

- Bryant University | B.S., Finance | 2019

Recent Business Background:

- Twin Focus Capital Partners, LLC | Analyst, Portfolio Management, Analytics and Reporting | March 2021 – Present
- Corbco Retirement Group | Portfolio Analyst | June 2019 – February 2021
- Corbco Retirement Group | Intern | December 2018 – May 2019

Professional Designations

- Series 65

Born:

- 1997

Contact Information

- Phone: +1 (617) 720-4537
- Email: cameron.iarrobino@twinfocus.com

Cameron is directly supervised by Laurence Grosbaum.

TwinFocus is required to make additional disclosures regarding this employee's disciplinary information, other business activities, or additional compensation. TwinFocus has no information to disclose in these matters regarding this employee.



Professional Designations

This Summary of Professional Designations is provided to assist you in evaluating the professional designations and minimum requirements of our investment professionals who hold these designations.

CFP®: CERTIFIED FINANCIAL PLANNER™

A CERTIFIED FINANCIAL PLANNER™ is a professional designation issued by the Certified Financial Planner Board of Standards, Inc. Candidates for the CFP® designation are tested on over 100 topics in the following areas: financial planning, insurance, investment planning and retirement and estate planning. A CERTIFIED FINANCIAL PLANNER™ is qualified to give financial advice and make financial decisions for individuals seeking their expertise. A CERTIFIED FINANCIAL PLANNER™ must participate in continuing education, including ethics training, to maintain his or her certification.

CPA: Certified Public Accountant

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

PFS: Personal Financial Specialist

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, certificate, or permit, none of which are in inactive status; fulfill 3,000 hours of personal financial planning business experience; complete 75 hours of personal financial planning CPE credits; pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and the Statement on Standards in Personal Financial Planning Services, when providing personal financial planning services. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

CFA: Chartered Financial Analyst

The CFA® charter is a credential awarded by the CFA Institute to individuals who meet its education, examination, sponsorship, experience and ethics requirements. To earn a CFA® charter, eligible candidates must have four years of qualified investment work experience, become a member of the CFA Institute, adhere to the Code of Ethics and Standards of Professional Conduct on an ongoing basis, and complete the CFA® program, which requires the passage of three separate six-hour examinations. Topics tested by the CFA Institute include ethical standards, quantitative methods, economics, financial reporting, corporate finance, equities, fixed income, derivatives, alternative investments, and portfolio management.



CAIA: Chartered Alternative Investment Analyst

The CAIA Charter, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investments, structures, and ethical obligations. To qualify for the CAIA Charter, finance professionals must complete a self-directed, comprehensive course of study on risk-return attributes of institutional quality alternative assets; pass both the Level I and Level II CAIA examinations at global, proctored testing centers; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent) plus have at least one year of professional experience or have four years of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related fields. Once a qualified candidate completes the CAIA program, he or she may apply for CAIA membership and the right to use the CAIA designation, providing an opportunity to access ongoing educational opportunities.

CISP: Certified IRA Services Professional

The CISP certification is issued by the American Bankers Association's Institute of Certified Bankers. Successful candidates must complete two years of dedicated IRA operational and technical experience plus completion of an educational program, or complete four years of dedicated IRA operational and technical experience. Successful candidates must also pass a final certification examination. Certified IRA Services Professionals must complete 24 credits of continuing education every three years and adhere to the Institute of Certified Banker's Code of Ethics.

Certified Investment Management Analyst® (CIMA®)

The CIMA certification, administered through Investment Management Consultants Association (IMCA), signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass a Qualification Examination, successfully complete a one-week classroom education program, pass a Certification Examination, and have an acceptable regulatory history. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.

Series 65 License:

Series 65 is a securities license issued by the North American Securities Administrators Association (NASAA) that is administered by FINRA, which allows individuals to serve as investment advisors. Candidates who passed the Series 65 exam were tested on the following areas: laws, regulations, ethics, and investment products.

Series 66 License:

Series 66 is a securities license issued by the North American Securities Administrators Association (NASAA) that allows an individual the right to register as an investment advisor representative and/or securities agent. Candidates who pass the Series 66 exam also meet the requirements of the Series 63 and 65 exams.

Series 7 License:

The Series 7 is an exam and license that entitles the holder to sell all types of securities products. The bulk of the Series 7 exam focuses on investment risk, taxation, equity and debt instruments, packaged securities, options, retirement plans and interactions with clients.



Item 3. Disciplinary Information

Twin Focus is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of its employees. Twin Focus has no information to disclose in relation to this Item except as may be noted in an individual employee's Item 2 biographical background.

Item 4. Other Business Activities

Twin Focus is required to disclose information regarding any investment-related business or occupation in which its employees are actively engaged. Twin Focus has no information to disclose in relation to this Item except as may be noted in an individual employee's Item 2 biographical background.

Item 5. Additional Compensation

Twin Focus is required to disclose information regarding any arrangement under which its employees receive an economic benefit from someone other than a client for providing investment advisory services. All employees listed herein receive compensation solely for their responsibilities at TwinFocus Capital Partners and earn income from no other material source, except as may be noted in an individual employee's Item 2 biographical background.

Item 6. Supervision

All firm personnel are monitored and supervised by one or more of the following: the firm's principals, Paul Karger and Wesley Karger. Supervision is ongoing and includes trade supervision, email monitoring, monitoring of personal trading, periodic performance evaluations, staff meetings and direct communications.



Maintaining your trust and confidence is among our highest priorities. We recognize that protecting the privacy and security of our customers is an important responsibility. That's why we at Twin Focus Capital Partners, LLC want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information.

The Privacy Policy of Twin Focus Capital Partners, LLC

It is the policy of Twin Focus Capital Partners, LLC to protect and safeguard the privacy and security of the personal information the firm obtains about its clients.

Twin Focus Capital Partners, LLC has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Your Information

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

Changes to our Privacy Policy or Relationship with You

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

Twin Focus Capital Partners, LLC, a Registered Investment Adviser
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www.TwinFocus.com