

# PRIVACY NOTICE

APRIL 2023

## 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 products or services 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? |
|---|-----------------------|-----------------------------|
| <b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | YES                   | NO                          |
| <b>For our marketing purposes</b> – to offer our products and services to you   | YES                   | NO                          |
| <b>For joint marketing with other financial companies</b>   | NO                    | N/A                         |
| <b>For our affiliates’ everyday business purposes</b> – information about your transactions and experiences   | YES                   | NO                          |
| <b>For our affiliates’ everyday business purposes</b> – information about your creditworthiness   | YES                   | NO                          |
| <b>For our affiliates to market to you</b>  | NO                    | N/A                         |
| <b>For nonaffiliates to market to you</b>   | NO                    | N/A                         |

**QUESTIONS?** Call (617) 720-4500 or please visit [www.TwinFocus.com](http://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 has implemented security measures intended to comply with applicable state and 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 and entities not affiliated with TwinFocus 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

### Affiliates

Companies related by common ownership and control. They can be financial and nonfinancial companies. The following is a non-exhaustive list of affiliates of TwinFocus:

- TF Realty Partners, LLC
- TwinFocus, LTD.

### Nonaffiliates

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

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

### Joint Marketing

A formal agreement between non-affiliated financial companies that together market financial products or service to you.

- TwinFocus does not jointly market.