

## FACTS

### WHAT DOES THE COLONY GROUP, LLC DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial advisory 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?

The types of personal information we collect and may share depend on the services we provide to you. This information can include:

- Contact information
- Social Security number
- Income-related information
- Account information, such as balance and transaction history
- Investment experience
- Tax information

When you are *no longer* our client, we continue to share your information as described in this notice.

#### How?

All financial advisory companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial advisory companies can share their customer's personal information; the reasons The Colony Group, LLC ("Colony") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Can Colony share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain the client-advisor relationship and 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 services to you	Yes	No*
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

\*We do allow you the option to unsubscribe or opt-out of certain marketing communications with us.

#### Questions?

Call 800-758-8200 or go to [www.thecolonygroup.com](http://www.thecolonygroup.com)

## Who we are

**Who is providing this notice?**

Colony

## What we do

**How does Colony protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include privacy safeguards and secured files and buildings.

**How does Colony collect my personal information?**

We collect your personal information, for example, when you

- open an account and/or give us your income information
- tell us about your portfolio
- deposit or transfer money
- enter into an advisory contract
- visit our website

When you visit our website, cookies are used to help us understand your preferences based on previous or current site activity, which enables us to provide users with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so we can offer better site experiences and tools in the future. Cookies may also be used by third parties to target advertising on other sites based on users' online activity.

We also collect your personal information from other third parties (e.g., custodians of your accounts).

**Why can't I limit all sharing?**

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Focus Operating, LLC, Focus Treasury & Credit Solutions, LLC, Focus Risk Solutions, LLC, and Sentinel Pension Advisors Inc.*

**Nonaffiliates**

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

- *Colony does not share personal information with nonaffiliates for the purpose of marketing to you.*

**Joint marketing**

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

- *Colony does not jointly market.*

## Other important information

If you are a California resident, California law provides you with additional rights. To learn more about your California privacy rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act ("CPRA"), please see our CCPA Privacy Notice.