



# Brightwater Advisory

A Registered Investment Adviser

Rev. February 2023

## FACTS

### WHAT DOES BRIGHTWATER ADVISORY, LLC DO WITH YOUR FINANCIAL INFORMATION?

In 2001, Congress passed the Gramm-Leach-Bliley Act to help consumers better understand how the privacy of their financial information is protected. The SEC’s Regulation S-P (Privacy of Consumer Financial Information), which was adopted to comply with Section 504 of the Gramm-Leach-Bliley Act, requires investment advisers to disclose to their clients, who are Natural Persons, its policies and procedures regarding the use and safekeeping of client records and information. This federal law requires us, as a registered investment adviser, to provide information to you on an annual basis regarding our privacy practices.

## 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?

Regulation S-AM (“Reg S-AM”) prohibits a registered investment adviser from using information about an individual consumer that has been obtained from an affiliated entity for marketing purposes unless the information-sharing practices have been disclosed and the consumer has not opted out.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our client. This information may include your:

|   |             |
|---|-------------|
| Name and address                                  | •Assets     |
| E-mail address                                    | •Income     |
| Phone number                                      | •Account    |
| Social security or taxpayer identification number | •Investment |
| Accounts at other institutions                    |             |

In addition, we may collect non-public information about you from the following sources:

- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
  - Information about your transactions with us or others
- We do not sell your non-public personal information to anyone.

## 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 Brightwater Advisory, LLC (also collectively referred to hereinafter as “we”, “us” or “our”) chooses to share; and whether you can limit this sharing.



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| Reasons we can share your personal information  | Does Brightwater Advisory, LLC 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   | No                                    | No                          |
| <b>For joint marketing with other financial companies</b>   | No                                    | Not Applicable              |
| <b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences   | No                                    | Not Applicable              |
| <b>For our affiliates' everyday business purposes –</b> information about your creditworthiness   | No                                    | Not Applicable              |
| <b>For our affiliates to market to you</b>  | No                                    | Not Applicable              |
| <b>For nonaffiliates to market to you</b>   | No                                    | Not Applicable              |

**Questions?**

Call 813-251-6310 or go to [www.brightwateradvisory.com](http://www.brightwateradvisory.com)



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## Who we are

**Who is providing this notice?**

Brightwater Advisory, LLC

## What we do

**How does Brightwater Advisory, LLC protect my personal information?**

To protect your personal information internally, we permit access only by authorized employees who need to know such information and maintain commercially reasonable physical, electronic, and procedural safeguards to protect your personal information from unauthorized access and disclosure. Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. As such, we limit employee access to information only to those who have a business or professional reason for knowing and only to nonaffiliated parties as permitted by law. For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and discrete and proper business purposes in connection with the servicing and management of your account. These measures include computer safeguards and secured files and buildings. We do not sell personal information about our clients for any purpose. We maintain physical, procedural and electronic safeguards to protect your personal information from unauthorized access and use and we use security measures that comply with federal law in an effort to protect the information from access by unauthorized parties.

For unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law. Additionally, we conduct annual reviews of all our third-party service providers. We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. Personally identifiable information about you will be maintained during the time you are a client and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board and AICPA Code of Ethics. After this required period of record retention, all such information will be destroyed.



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|   | <p>If you close your account(s) or become an inactive client, Brightwater Advisory, LLC will continue to adhere to the privacy practices as described in this notice. If at any time it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice so that you will have the opportunity to opt out of such disclosure.</p> <p>If, for any reason, you feel our records contain inaccurate personal information, please notify us and we will promptly update or correct our records.</p>  |
| <p><b>How does Brightwater Advisory, LLC collect my personal information?</b></p> | <p>When you became a client of Brightwater Advisory, LLC, you provided us with certain personal and financial data. We believe that this information is, and should remain, private and confidential. Our Privacy Policy is designed to help you understand how we strive to protect your non-public, personal information, while providing you with the best possible service. Brightwater Advisory, LLC protects the security and confidentiality of the personal information we have and make reasonable efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Information is collected from clients at the inception of their accounts and occasionally thereafter, primarily to assist in providing clients with requested services. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information and we do everything reasonably possible to maintain that trust.</p> <p>We collect and maintain non-public, personal information we receive from you directly, on applications, and other forms, as well as from communications (electronic, telephone, written, or in person), and from your transactions with unaffiliated parties. This information includes, for example: your name, address, Tax Identification Number or Social Security Number, assets, income, family and marital status, employment information, financial needs and goals, and account balances and transactions, including transactions with unaffiliated parties, such as custodians. We use this information to process your requests, to provide you with additional information about products and services, and to evaluate your financial needs.</p> <p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"><li>▪ Open an account</li><li>▪ Deposit money</li><li>▪ Seek advice about your investments</li></ul> |



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|   | <ul style="list-style-type: none"> <li>▪ Enter into an investment advisory contract</li> <li>▪ Tell us about your investment or retirement portfolio or earnings</li> </ul> <p>Further, we also collect your personal information from other companies.</p>  |
| <b>Why can't I limit all sharing?</b>   | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes— 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> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p> <p>We may disclose non-public, personal information to non-affiliated companies, regulatory authorities, law enforcement agencies, and self -regulatory organizations as permitted and/or required by applicable law. For example, we may disclose such information at the request of a regulatory agency with jurisdiction over us in connection with their assessing our compliance with industry standards, as well as to our attorneys, accountants, and auditors.</p> |
| <b>What happens when I limit sharing for an account I hold jointly with someone else?</b> | Your choices will apply to everyone on your account.   |

## Definitions

|                        |   |
|------------------------|---|
| <b>Affiliates</b>      | Companies related by common ownership and control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>We have no affiliates.</i></li> </ul>  |
| <b>Nonaffiliates</b>   | Companies not related by common ownership and control. They can be financial or nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>We do not share with nonaffiliates so that they can market to you.</i></li> </ul> |
| <b>Joint marketing</b> | A formal agreement between nonaffiliated financial companies that together market financial products or service to you. <ul style="list-style-type: none"> <li>▪ <i>We do not jointly market.</i></li> </ul>                          |

## Other important information

We may disclose personal information to those companies that help us process or service your account, including trust companies and brokerage firms, which you have provided authorization to.