

# FACTS

## WHAT DOES CLEARSTEAD TRUST, LLC DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some 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?

#### **What Information is Collected?**

The types of personal information we collect and share depend on the product or service you have with us. We may collect information directly and indirectly from you, such as information you provide to us, information shared with us from third parties, and information collected relating to your device, browser and preferences. This information can include:

#### **Personal Information**, such as:

- Name
- Postal Address
- Email Address
- Social Security number/Tax-Identification Number

#### **Financial Information**, such as:

- Income
- Assets
- Account balances

#### **Device Information**, such as:

- Cookies
- Log Files
- IP Addresses

#### **What are your rights?**

Under certain circumstances, you may have rights in relation to your personal data, which may include the right to:

- Request access to your personal data;
- Request correction to your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Object to automated decision-making;
- Request transfer of your personal data;
- Withdraw your consent, and
- Not be discriminated against for exercising these rights.

### How?

#### **How do we use your information?**

- To provide, operate, maintain and improve our website and our services
- To communicate with you and with our partners to provide our services
- For limited marketing and promotional purposes

Reasons we can share your personal information	Has Clearstead Trust Shared in the Last 12 Months?
<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
<b>For our marketing purposes—</b> to offer our products and services to you	No
<b>For joint marketing with other financial companies</b>	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No
<b>For our affiliates to market to you</b>	No
<b>For non-affiliates to market to you</b>	No

### To limit our sharing

- Call 207-775-7200
- Visit us online: [www.clearsteadtrust.com](http://www.clearsteadtrust.com)
- Mail:  
Clearstead Trust  
1 Union Street, Suite 302  
Portland, ME 04101

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

### Questions?

Call 207-775-7200 or go to [www.clearsteadtrust.com](http://www.clearsteadtrust.com)

## Who we are

<b>Who is providing this notice?</b>	Clearstead Trust, LLC
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## What we do

<b>How does Clearstead Trust protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Clearstead Trust collect my personal information?</b>	<p>We collect the personal information provided by you, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Enter into an advisory agreement</li> <li>▪ Seek financial advice</li> <li>▪ Open accounts that Clearstead Trust has access</li> <li>▪ Make deposits or withdrawals from your account</li> <li>▪ Tell us about your investment or retirement portfolio</li> <li>▪ Provide tax documents</li> <li>▪ Provide information on non-investment assets</li> <li>▪ Give us your employment history</li> </ul>

## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership, control, or other relationships. They can be financial and nonfinancial companies. These include:</p> <ul style="list-style-type: none"> <li>▪ Clearstead Advisors, LLC, parent company of Clearstead Trust, LLC</li> <li>▪ Hazard &amp; Hall CPA prepares tax returns for some clients of Clearstead Trust</li> <li>▪ Avalon Trust, LLC, a wholly owned subsidiary of Clearstead Advisors, LLC.</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ Clearstead Trust does NOT share with non-affiliates</li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ Clearstead Trust does NOT share with non-affiliates</li> </ul>

## Other important information

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