

Privacy Notice

Disclosures

Investment advisory and financial planning services are offered through Smarter Bear LLC dba Smarter Bear Financial Advisors, a Massachusetts state registered investment adviser. Smarter Bear Financial Advisors (“Smarter Bear”) investment advice is given only within the context of its contractual agreements with each client. Smarter Bear’s investment advice may only be rendered after the delivery of its Form ADV Part 2 and the execution of an agreement by the client or investor. Smarter Bear’s Form ADV Part 2 describes Smarter Bear’s business operations, services and fees and is available upon request. The firm’s principal office: 106 Elmwood Rd., Swampscott, MA 01907 Phone 508-203-1479. Custody services are offered by The Charles Schwab Corporation (“Schwab”). Schwab has not created, supplied, licensed, endorsed, or otherwise sanctioned any content on the Smarter Bear Financial Advisors website.

IMPORTANT CONSUMER INFORMATION An investment adviser (IA), or IA representative may only transact business in a state if first registered, or is excluded or exempt from state investment adviser or IA registration requirements, as appropriate. Follow-up, individualized responses to persons in a state by such a firm or individual that involve either effecting or attempting to effect transactions in securities, or the rendering of personalized investment advice for compensation, will not be made without first complying with appropriate registration requirements, or an applicable exemption or exclusion.

Opinions expressed herein are solely those of Smarter Bear Financial Advisors. Material presented is believed to be from reliable sources; however, we make no representations as to its accuracy or completeness. The information in this material is not intended as tax or legal advice. It may not be used for the purpose of avoiding any federal tax penalties. Please consult legal or tax professionals for specific information regarding your individual situation.

Privacy Policy

OUR COMMITMENT

Smarter Bear LLC d/b/a Smarter Bear Financial Advisors (“Smarter Bear” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Smarter Bear (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset.

Smarter Bear does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

What you need to know

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. All our employees are trained on their responsibilities and the proper procedures to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<p>Providing Contracted Services to our Clients</p> <p>We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	Yes	No
<p>Marketing Purposes</p> <p>Smarter Bear does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Period. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	No	Not Shared
<p>Authorized Users</p> <p>Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).</p>	Yes	Yes
<p>Information About Former Clients</p> <p>Smarter Bear does not disclose and does not intend to disclose, non-public personal information to</p>		

non-affiliated third parties with respect to both current and former Clients.	No	Not Shared
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STATE-SPECIFIC REGULATIONS

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at support@smarterbear.net or calling us at (508) 203-1479