



Cote Financial Management, LLC Privacy Policy

Our Commitment to Your Privacy:

Protecting our clients' privacy is of utmost importance to Cote Financial Management, LLC ("Cote Financial Management" or "the firm"). It is Cote Financial Management's policy that no private client financial or personal information obtained by us is sold or made available to third parties except that:

- Third Parties may be used by the firm to assist in the management or maintenance of client account (such as client's custodian).
- Client information may be released in accordance with applicable laws and regulation.

We will not share non-public personal information with non-affiliated third parties without prior client consent, except for specific purposes described below. This notice explains our collection, use, and safeguarding of client information.

Why 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.

How Cote Financial Management gathers Information:

In connection with providing clients with investment management services, we may obtain information about our clients through client agreements and other information that clients provide to us, whether in writing, in person, by telephone, electronically, or by any other means.

What information do we collect from you?

- Driver's license number
- Date of birth
- 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

Sharing Information with Non-Affiliated Third Parties:

We only disclose non-public client information to non-affiliated third parties without client consent when we believe it necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information.
- To provide client account services or account maintenance.
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities.
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of our business or an operating unit.
- To help us prevent fraud.

We do not make any disclosure of client non-public information to other companies who may want to sell their products or services to you. For example, we do not sell client lists and we will not sell client names to catalogue companies.

Massachusetts Clients

In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. 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 by our Custodian/ Broker Dealer Charles Schwab, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.

Opt Out Provision:

If, at any time in the future, it is necessary to disclose any of client personal information in a way that is inconsistent with this policy, we will give our clients advance notice of the proposed disclosure so that they will have the opportunity to opt out of such disclosure.

Current and Former Clients:

Cote Financial Management does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients, except for inquiries by securities regulators as noted above.

To Whom This Policy Applies:

This Privacy Policy applies to individuals who obtain or have obtained services from Cote Financial Management used primarily for personal, family, or household purposes. This Notice will be sent annually to our current clients.

Safeguards to Protect Your Personal Information:

We restrict access to your personal information to employees and third parties who need it to perform their responsibilities. To protect your personal information from unauthorized access and use, we have implemented physical, electronic, and procedural safeguards that comply with federal standards, including protection of your personal information in the course of its disposal. Such measures include computer safeguards and secured files and buildings.

Special Notice to Residents of Massachusetts

If your account has a Massachusetts home address, we limit sharing of your personal information to non-affiliated third parties, and we limit such sharing of your personal information with our affiliates, except as permitted by the law of your home state. Because sharing of your personal information (including eligibility information) is necessary for the Broker-Dealers supervision of the Representative, we request your consent (“opt-in”) to disclosure of your personal information to the Broker-Dealers. You are not required to consent, but we may be required to terminate your advisory agreement if you do not consent. You may consent (“opt-in”) by calling Charles Schwab at their client service number (800) 515-2157 and speaking with a member of their Compliance staff, or calling our main office at (978) 767-9501 and asking to speak with Stephen Cote.

Amendments

We may amend this Notice at any time; former clients will not be sent amended Notices; amended Notices will not apply to former clients until they receive them.