



Privacy Policy

Maintaining the trust and confidence of our Clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Holden Family Office, LLC (hereinafter “HFO”).

Information We Collect: HFO does not disclose nonpublic personal information about its Clients or former Clients to any persons other than as described below. In connection with providing investment advice and other services, we obtain non-public personal information about you, including:

- Information we receive from discussions with you or from documents you may deliver (account applications), such as your name, address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Account transactions and wire transfer instructions;
- Information about your transactions with us, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may disclose information that we collect in accordance with this policy in order to service Client accounts and effect Client transactions. HFO does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account with us, except under the following circumstances:

- To affiliates and/or entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies;
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants, consultants and auditors; and
- To government entities, self-regulatory organizations, or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. HFO does not receive information regarding marketing eligibility from affiliates to make solicitations.

Our Security Policy: To protect your personal information from unauthorized access and use, we maintain physical, electronic, and procedural security measures to safeguard confidential Client information. These measures include computer safeguards and secured files and offices.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive Client, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to Sean Meunier at Holden Family Office, LLC, 701 Avenue L, #104A, Delray Beach Florida 33483; (413) 427-0331.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at Holden Family Office, LLC, 701 Avenue L, #104A, Delray Beach Florida 33483; (413) 427-0331.