

FACTS

WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

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?	<p>The types of personal information we collect and share depend on the services we provide to you. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and income ▪ Account balances and account numbers ▪ Investment experience and account transactions <p>When you are <i>no longer</i> our client, we may continue to share your information as described in this notice.</p>
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons we choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Gratus share this information?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or provide reporting to you.	Yes	No
For our marketing purposes— to offer our services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For non-affiliates to market to you	No	We don't share

Questions?

Phone: (404) 961-6000

Email: clientsupport@gratuscapital.com

Who we are

Who is providing this notice?

Gratus Capital, LLC

What we do

How does Gratus protect my personal information?

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.

How does Gratus collect my personal information?

We collect your personal information, for example, when you

- Open an account or give us your income information
- Tell us about your portfolio or deposit money
- Enter into an investment advisory contract

We may also collect your personal information from other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Gratus shares nonpublic personal information with its parent company affiliate Focus Financial Partners, LLC, for its internal and external auditing purposes.

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Non-affiliates that we share with can include companies that aggregate data for reporting purposes.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Gratus does not jointly market.

Other important information

Gratus is an affiliate of Focus Financial Partners, LLC, and we and other affiliates of Focus share certain of your personal information with an unaffiliated third party for the purpose of aggregating it and providing summary information based on this data to our parent company, Focus Financial Partners.