

# Cross Staff

INVESTMENTS, INC

DBA CANDACE SHIRA ASSOCIATES, LLC

FACTS	<b>WHAT DOES CANDACE SHIRA ASSOCIATES, LLC DO WITH YOUR PERSONAL INFORMATION?</b>	
<b>Why?</b>	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.	
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. The information can include:</p> <ul style="list-style-type: none"> <li>• <b>Social Security Number</b> and <b>Date of Birth</b></li> <li>• <b>Income</b> and <b>Net Worth</b></li> <li>• <b>Tax Information</b> and <b>Account Balances and/or Account Transactions</b></li> </ul> <p>When you are no longer our customer, we may continue to share your information as described in this notice.</p>	
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Candace Shira Associates, LLC chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>		
	<b>Does Cross Staff Investments, Inc. share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain external technology, maintain your account(s), or respond to court orders and legal investigations.	<b>YES</b>	<b>We don't share.</b>
<b>For our marketing purposes</b> – to offer our products and services to you.	<b>NO</b>	<b>N/A</b>
<b>For joint marketing with other financial companies</b>	<b>NO</b>	<b>N/A</b>
<b>For our affiliates' everyday business purposes</b> – information about your transactions and experiences	<b>YES</b>	<b>We don't share.</b>
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	<b>We don't share.</b>	<b>N/A</b>
<b>For our nonaffiliates to market to you</b>	<b>We don't share.</b>	<b>N/A</b>
<b>Questions?</b>	Call 585-249-1550 or go to <a href="http://www.candaceshira.com">www.candaceshira.com</a> .	
<b>Who is providing this Notice?</b>	Cross Staff Investments, Inc doing business as Candace Shira Associates, LLC	

<b>What we do</b>	
<b>How does Candace Shira Assoc, LLC 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, secured files and business location. We also utilize technology partners to assist us in providing our services to you. We annually review the privacy and security policies of those vendors. <b>Our staff is also aware of the confidential nature of your information and is bound to honor that confidentiality.</b>
<b>How does Candace Shira Assoc, LLC collect my personal information?</b>	We collect your personal information when you: <ul style="list-style-type: none"> <li>• Open an account or tell us about your financial accounts</li> <li>• Participate in a meeting or engage us in financial planning</li> <li>• Seek advice about your accounts</li> </ul> This information is deemed as confidential and only used as stated within this notice.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes-information about creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you.</li> </ul> State laws and individual companies may give you additional rights to limit sharing
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> <li>• <b><i>Cross Staff Investments, Inc. and Candace Shira Associates, LLC are affiliated entities.</i></b></li> </ul>
<b>Non-Affiliates</b>	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> <li>• <b><i>Candace Shira Assoc, LLC has entered into agreements with non-affiliates in order to provide custodial and reporting services. They must maintain confidentiality of your information.</i></b></li> </ul>
<b>Joint Marketing</b>	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• <b><i>This does not apply to customers of Candace Shira Associates, LLC</i></b></li> </ul>
<b>Other Important Information</b>	
Candace Shira Associates, LLC will provide this notice to customers that initially engage our services. The policy will be sent to all customers should this policy be materially changed. Should any information regarding your account with Candace Shira Associates, LLC change or is inaccurate please contact our office. This privacy notice is available upon request by calling 585-249-1550.	