

# Cross Staff

INVESTMENTS, INC

DBA CANDACE SHIRA ASSOCIATES, LLC

<b>FACTS</b>	<b>WHAT DOES CROSS STAFF INVESTMENTS, INC. DBA 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>Transaction History</b></li> <li>• <b>Income</b> and <b>Assets</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 Assoc., LLC chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>		<b>Does Candace Shira Assoc., LLC share?</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>For our marketing purposes</b> – to offer our products and services to you.		<b>NO</b>
<b>For joint marketing with other financial companies</b>		<b>NO</b>
<b>For our affiliates' everyday business purposes</b> – information about your transactions and experiences		<b>NO</b>
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness		<b>NO</b>
<b>For our nonaffiliates to market to you</b>		<b>NO</b>
		<b>Can you limit this sharing?</b>
		<b>NO</b>
		<b>We don't share.</b>
		<b>We don't share.</b>
		<b>NO</b>
		<b>We don't share.</b>
		<b>We don't share.</b>

## Questions?

Call 585-249-1550 or go to [www.candaceshira.com](http://www.candaceshira.com).

What we do	
<b>How does Candace Shira Assoc., LLC protect my personal information?</b>	<p>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 building. We also utilize technology partners to assist us and annually review their privacy and security policies.</p> <p><b>Staff is aware of the confidential nature of information and must honor that confidentiality.</b></p>
<b>How does Candace Shira Assoc., LLC collect my personal information?</b>	<p>We collect your personal information when you:</p> <ul style="list-style-type: none"> <li>• Open an account or provide account information</li> <li>• Seek financial or tax advice or enter into an investment advisory contract</li> <li>• Seek advice about your investments</li> </ul> <p>This information is deemed as confidential and only used as stated within this notice.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only:</p> <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>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <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>	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <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>	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• <b><i>This does not apply to customers of Candace Shira Assoc., LLC</i></b></li> </ul>
Other Important Information	
<p>Candace Shira Assoc., 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.</p>	