CLARO ADVISORS

# Privacy Policy

CRD# 160294

PRIVACY NOTICE

EFFECTIVE JULY 24, 2026

**CLARO ADVISORS INC.**

100 High Street, Suite 950, Boston, MA 02110

**CONTACT**

800-604-2838 · Fax 800-508-1983 · www.claroadvisors.com

**OUR COMMITMENT TO YOU**

Claro Advisors Inc. ("Claro" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Claro (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Claro does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

## 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.

## What information do we collect from you?

- Social security or taxpayer identification number
- Name, address and phone number[s]
- E-mail address[es]
- Account information (including other institutions)
- Assets and liabilities
- Income and expenses
- Investment activity
- Investment experience and goals

## What information do we collect from other sources?

- Custody, brokerage and advisory agreements
- Other advisory agreements and legal documents
- Transactional information with us or others
- Account applications and forms
- Investment questionnaires and suitability documents
- Other information needed to service account

## How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

| BASIS FOR SHARING | DO WE SHARE? | CAN YOU LIMIT? |
|---|---|---|
| **Servicing our clients**<br>We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. | YES | NO |
| **Marketing Purposes**<br>Claro does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Claro or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes. | NO | NOT SHARED |
| **Authorized Users**<br>Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s]. | YES | YES |
| **Information About Former Clients**<br>Claro 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. | NO | NOT SHARED |

## State-specific regulations

**Massachusetts**

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, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 800-604-2838 or via email at info@claroadvisors.com.