

# FACTS

## WHAT DOES STONEBRIDGE ADVISORS LLC (“Stonebridge”) DO WITH YOUR PERSONAL INFORMATION?

<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 allows financial companies to share nonpublic personal information necessary for processing or administering a financial transaction requested or authorized by a consumer. In addition, federal law allows information sharing for purposes of preventing fraud, responding to judicial process or a subpoena, or complying with federal, state, or local laws. 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. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number</li> <li>▪ Account balances</li> <li>▪ Transaction history</li> <li>▪ Other personal information</li> </ul>
<b>How?</b>	All financial companies need to share client personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client’s personal information; the reasons Stonebridge chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Stonebridge share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	No	No
<b>For joint marketing with other financial companies</b>	No	No
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	No	No
<b>For our affiliates’ everyday business purposes—</b> information about your creditworthiness	No	No
<b>For our affiliates to market to you</b>	Yes	No
<b>For non-affiliates to market to you</b>	No	No

<b>Questions?</b>	<p>Call: 203-210-0295</p> <p>Mail: Stonebridge Advisors LLC c/o CCO 10 Westport Rd, Suite C-101 Wilton, CT 06897 <a href="mailto:sdevore@stonebridgeft.com">sdevore@stonebridgeft.com</a></p>
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## Who we are

**Who is providing this notice?**

Stonebridge Advisors LLC

## What we do

**How does Stonebridge 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 Stonebridge collect my personal information?**

Client non-public personal information is collected by the Company in the course of conducting business. This information may be collected from multiple sources. These sources include, but are not limited to, the collection of your information during the performance of our business operations and services, from your accounts and transactions, from applications and other forms, when processing business on your behalf, during electronic, telephone, written, and verbal communications and/or communications with you and with your authorized representatives (such as your attorney, accountant, or any other third party representative you have authorized), and from other personal information that you provide.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- Sharing for non-affiliates to market to you

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

**What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on the account.

## Definitions

**Affiliates**

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

- Our affiliates include First Trust Portfolios. We do not share information with any other affiliates.

**Non-affiliates**

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

- We do not share information with non-affiliates for marketing purposes.

**Joint marketing**

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- We do not have any agreements for marketing purposes.

## Other important information

For California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account.

## GDPR SUPPLEMENT

Although Stonebridge is not located in the EU, our investor base includes residents of countries who have adopted the GDPR into their national regulations.

### **What information we collect about you and why.**

When you open an account with us, we collect the information necessary to comply with United States “Know Your Client” (KYC), anti-terrorism and anti-money laundering (AML) requirements. As a function of account management, we also have access to transaction history, account balance and payment history within each account, along with the client’s investment objectives for the account. We are required by law to retain KYC and AML and account performance information. We cannot open or maintain an investment account for you if you do not provide it, and we cannot delete this information if you ask us to.

### **Marketing and cookies**

We currently use a third party analytics tool, Google Analytics, to gather information for purposes of improving Stonebridge's website for marketing our products and services to you. This tool employs cookies, which are small pieces of text stored in a file by your web browser and sent to websites that you visit, to collect information, track website usage and viewing trends such as the number of hits, pages visited, PDFs viewed and the length of user sessions in order to evaluate website performance and enhance navigation of the website. We may also collect other anonymous information, which is generally limited to technical and web navigation information such as the IP address of your device, internet browser type and operating system for purposes of analyzing the data to make Stonebridge’s website better and more useful to our users. The information collected does not include any personal identifiable information such as your name, address, phone number or email address unless you provide that information through the website for us to contact you in order to answer your questions or respond to your requests. To find out how to opt-out of this service click on: [Google Analytics](#).

Our website contains links to a website that is not operated or controlled by us. By clicking on those links you will be leaving the Stonebridge-controlled environment. By providing these links we do not imply that we endorse these sites or have reviewed their privacy practices and policies. Please review the privacy policies of those websites or contact them directly for information on their privacy practices and policies.]

### **With whom we may share your data**

We only share your information with third party companies when such sharing is necessary to perform the services you have requested from us.

If you contact us requesting marketing and sales material about our firm, we may forward your request to First Trust Portfolios (an affiliate firm contracted to handle our sales and marketing), so that they may deliver you the requested material through the contact means you provided. The information you provide for this purpose is not used by Stonebridge for any other purpose. The information we provide to First Trust is handled by them in accordance with their privacy policy, which can be found at <https://www.ftportfolios.com/retail/PrivacyPolicy.aspx>

When your account is placed with us by your Financial Advisor (FA) or Wrap Fee Platform service provider they provide us access to some of the data that you gave them when you set up your account with them. We need this shared data to be able to manage the portion of your account that you have assigned to Stonebridge. The shared data is independently held by your FA outside of Stonebridge, and we do not have any control over the way they handle it. Please direct any questions you may have regarding their handling of your data to them.

Your data may also be disclosed to external parties as required by laws or regulations (e.g. court, tribunal, regulatory authority or governmental entity). **We never buy or sell your personal data.**

### **Your rights and how to exercise them**

The GDPR gives EU residents the right to know what data we have about them, to correct errors in the data, to know how we use the data, and to oppose the purposes for which we process that data. We only collect and hold your personal data to the extent we are required to by law and regulation, and do not use, analyze, or sell any of it for marketing or sales purposes. If you wish to correct an error you believe exists in your data held by Stonebridge, please let us know using the contact information provided above.

We retain your personal data is to comply with anti-terrorism, anti-money laundering, and recordkeeping regulations. Therefore, once you choose to become a Stonebridge client, we will be unable to comply with a request from you to cease collection of your personal data and/or to delete the data we already have.

If you are an EU resident and consider that our processing of your personal data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or place of the alleged infringement.

### **Confidentiality and Security**

Stonebridge maintains physical, electronic and procedural safeguards to protect your personal data.

### **Amendment Rights and Updates**

As required by law and regulations, we notify clients of our privacy policy at least annually. We reserve the right to amend this policy at any time. Our most up-to-date Privacy Policy is always available for your review on our website at [www.stonebridgeft.com](http://www.stonebridgeft.com).