

# Disclosure Statement

## Privacy Policy

We understand that confidentiality of your personal nonpublic client information is critical to you and we regard the protection of your personal client information as one of our most important responsibilities. It is our policy that we do not sell or offer nonpublic personal information to anyone. Furthermore, we will share your personal client information with others only as stated in this notice.

We may derive personal nonpublic information about our clients from various sources including, but not limited to information we receive from you on your new account form and from information provided to us by other financial advisors and/ or vendors providing services to you.

We take steps to safeguard our client information by restricting access to your personal account information to only those employees who have a need to know such information in order to service your account. All of our employees are professionals and recognize their responsibility to safeguard your personal information. Our written policies and employee training clearly identify steps to be taken to protect your personal information. We also provide physical and electronic and procedural safeguards to ensure confidentiality of your personal information.

We may disclose your nonpublic personal information between and among E. J. De La Rosa & Co. and affiliated companies which are commonly owned. We may also disclose nonpublic personal information to non-affiliated third parties or vendors. The primary non-affiliated third party who will receive information from us is our clearing firm. We will also disclose non-public personal information to securities regulators upon request; to other persons pursuant to subpoenas; or as otherwise required by law. Specifically, we may disclose to these service providers non-public personal information including:

Information we receive on subscription agreements, new account forms, such as name and address, account or tax identification number and the types and amounts of investments.

Information about transactions with us, our affiliates or others, such as participation in other investment programs, ownership of certain types of accounts, or other account data; and

Information we receive from a consumer reporting agency, such as an individual's creditworthiness and credit history.

Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose.

Should you decide to close your account(s) or if your account becomes inactive, we will continue to adhere to the privacy policy summarized in this notice and in our written privacy procedures. Should you have questions regarding this notice or our privacy policy please contact your account representative.

## FINRA Public Disclosure Program

As part of its Public Disclosure Program, the Financial Industry Regulatory Authority (FINRA) offers a toll-free number (1-800-289-9999) where investors can check for the disciplinary history of brokerage firms and their associated persons. FINRA maintains a website ([www.FINRA.com](http://www.FINRA.com)) with information for investors, including an Investor Alerts section, FINRA BrokerCheck and an Investor Complaint Center. An investor brochure that includes information describing the Public Disclosure Program is available by calling the toll-free number and on the FINRA website.