



DISCLOSURE NOTICES - KEEP FOR YOUR RECORDS

Privacy Policy

At Great Point Capital, LLC and Great Point Advisors, LLC (collectively “GPC/GPA”), protecting your privacy is very important to us. We value your trust and want you to understand what information we collect, how we use it, and how we protect it. The Gramm-Leach-Bliley Act, passed in 1999, requires that all companies distributing financial and insurance products to the public develop and publish a privacy policy. GPC/GPA’s Privacy Policy provides information relating to how and when we share customer information with unaffiliated third parties. A copy of our privacy policy is delivered to clients at the time of account opening; - either hand-delivered, electronically delivered or by mail, and annually thereafter.

Personal Information We May Collect

During our relationship, GPC/GPA may obtain nonpublic personal information from you. The information we obtain assists the firm and our Financial Advisors in providing you with products and services, and also to satisfy regulatory requirements. This information may be obtained from various sources including:

- Account applications and other forms,
- Your transactions with us or others,
- From written, electronic and verbal correspondence and communication, and/or
- From a consumer reporting agency.

The Balance of Respecting Your Privacy & Sharing Information with Third Parties

As a matter of policy, GPC/GPA do not disclose personal or account information provided by clients to non-affiliated third parties, except as follows:

- When required or permitted by law, or as necessary for third parties to perform their agreements with respect to services performed on our behalf.
- To administer, manage, service, and provide related services for client accounts, it is necessary for GPC/GPA to provide access to client information within the firm and to non-affiliated companies, with whom we have entered into agreements. The disclosure of information contained in any document completed by the client for processing and/or transmittal by GPC/GPA to facilitate the commencement, continuation, and/or termination of a business relationship between the client and/or GPC/GPA and a non-affiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, recordkeeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of GPC/GPA (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third-party service provider.

GPC/GPA reserves the right to:

- In limited circumstances, disclose or report personal information to non-affiliated third parties when the firm believes in good faith that disclosure is required under law, and to cooperate with regulators or law enforcement authorities as may be requested.
- Disclose information about client accounts to a non-affiliated third party at the client’s request, or with the consent of the client.



- Disclose personal information that is necessary in providing administrative, custodial, or customer assistance, and in preparing, printing and delivering statements and other client related documents. These companies include clearing firms, mutual fund, annuity and other financial services companies that aid in fulfilling these services to our clients.
- GPC/GPA do not provide information about our clients or former clients to any non-affiliated third party for marketing purposes.

Opt Out Provision

If your Financial Advisor leaves Great Point Capital, LLC, the broker-dealer, to join another broker-dealer that is a member of the Protocol for Broker Recruiting (to which our firm is a signatory), we may permit your advisor to retain certain contact information that may be used by his/her new firm; limited to your name, address, email address, phone number, account title and account type. If you object to such information being retained by your Financial Advisor or shared with his/her new firm, you may opt out by contacting our Compliance Department at 312-517-2606 or emailing Compliance@gpcchi.com.

Procedures to Safeguard Private Information

GPC/GPA maintain procedures and technology designed to prevent unauthorized access to private personal information. We restrict access to personal information to employees and service providers who need to know that information to provide products or services to you. Employees who violate our Privacy Policy are subject to company and regulatory disciplinary action.

When accessing your account via a link from www.GreatPointCapital.com using a browser, it is encrypted using Secure Socket Layer (SSL) 128-bit encrypted security. This technology is used to protect the confidentiality of your personal information.

Change in Privacy Policy

GPC/GPA reserve the right to modify or supplement this Privacy Policy at any time. If a material change is made, we will provide current clients with a revised notice that describes our new policy and if such practices so require, we will give them a reasonable opportunity to opt out of the disclosure of information under the revised Privacy Policy.



Business Continuity Plan

Great Point Capital, LLC and Great Point Advisors, LLC (collectively “GPC/GPA”) are committed to providing reliable, trustworthy service that represents the best interests of our clients. The firm has developed a Business Continuity Plan to protect clients and employees in the event of an emergency or significant business disruption. Since the timing and impact of disasters and disruptions are unpredictable, we anticipate needing to be flexible in responding to actual events as they occur.

The Plan is designed to protect client assets and help prepare for securing employees’ safety and firm property, making financial and operational assessments, promptly recovering and resuming operations, protecting the firm’s books and records, and allowing our clients to transact business and to access their funds and securities. In short, our Business Continuity Plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

The Business Continuity Plan considers various scenarios that range in severity - from just our office to the entire building, to our local area, to a regional level. In the event GPC/GPA’s office location is inaccessible, alternative locations have been established and prepared to facilitate business operations. The firm has redundancies in place for its business-critical systems and our phone system has a forwarding feature when it is not working. Depending on the severity of the issue, we believe that we can resume most business functions within the same day as the disruption. Our goal in all situations is to return to normal business conditions as soon as possible, with minimal impact to our clients and employees. In an extreme situation where continuing business may not be possible or practical, GPC/GPA ensure clients the ability to transact business and to access to their funds and securities.

Corporate Headquarters Location and Telephone Numbers

Great Point Capital, LLC
Great Point Advisors, LLC
200 West Jackson Blvd, Suite 1000
Chicago, IL 60606
(312) 356 – 4400
Website www.GreatPointCapital.com

Custody of Assets

Our clearing firm backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that should it experience a significant business disruption, its objective is to provide the best possible recovery to our firm and clients.

Clients with accounts held directly at a mutual fund, annuity, life insurance or other financial services company will have the ability to call those respective companies directly, if needed.



Limited Ability

GPC/GPA do not guarantee that for every disaster or business disruption, such plans will be successfully implemented or that such plans will be sufficient and appropriate to avoid, deter or mitigate the disaster or business disruption. If you have questions about our Business Continuity Plan, contact Compliance at (312) 517-2606.

Change in Policy & Updates

GPC/GPA's Business Continuity Plan is subject to change at any time without notice. Updated plans will be promptly posted on our web site: www.GreatPointCapital.com



Customer Identification Program

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.

This Notice answers some questions about this broker/dealer's Customer Identification Program.

What types of information are required to be provided?

At the time you open an account with us, we are required to collect information such as the following from you:

- Your name
- Your date of birth
- Your address
- An identification number
 - U.S. Citizen: taxpayer identification number (social security number or employer identification card)
 - Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification number or

You may also need to show your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employee identification number, certified articles of incorporation, government-issued business license, a partnership agreement or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, FINRA and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

What happens if I don't provide the information requested, or my identity cannot be verified?

GPC may not be able to open an account or carry out transactions for you. If we have already opened an account for you, we may have to close it.

We thank you for your patience and cooperation, and hope that you will support the financial services industry's efforts to deny terrorists and money launders' access to America's Financial System.

Member FINRA, SIPC

Great Point Capital, LLC is a member of

FINRA Financial Industry Regulatory Authority
1735 K. Street NW
Washington, DC 20006-1516
www.FINRA.org

GREAT POINT CAPITAL, LLC; MEMBER FINRA, SIPC
GREAT POINT ADVISORS, LLC; A SEC REGISTERED INVESTMENT ADVISER
200 W. JACKSON BLVD., SUITE 1000 CHICAGO, IL 60606
PHONE (312) 356-4400 FAX (312) 957-0407
WWW.GREATPOINTCAPITAL.COM



SIPC Securities Investor Protection Corporation

An explanatory brochure of the protection afforded to investors by SIPC is available upon request at:
www.SIPC.org or (202) 371-8300

Investment adviser registered with the US Securities & Exchange Commission

Additional information about Great Point Advisor, LLC is also available on the SEC's website at
www.adviserinfo.sec.gov.

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