

## **At Global Retirement Partners, LLC We Respect Your Privacy**

This privacy notice is being sent on behalf of Global Retirement Partners, LLC and its Investment Advisory Representatives (collectively called GRP.)

We recognize our obligation to keep information about you secure and confidential. It's important for you to know that we do not sell your information to anyone. We restrict access to non-public personal information about you to those Investment Advisory Representatives and employees who need to know that information to provide products or services to you. We also maintain physical, electronic, and procedural safeguards to guard your non-public personal information. This notice describes how we handle your financial information that we collect while conducting our business.

We collect information about you (such as your name, address, social security number, assets and income or company information) from our discussions with you, and from documents that you may deliver to us in the course of providing services to you. We may use this information to open an account for you or to process a transaction for your account. In order to service your account and effect your transactions, we may provide your personal information to firms (such as a mutual fund company or custodial broker-dealer) that assist us in servicing your account and have a need for such information, as permitted by law. We may also disclose such information to the Securities & Exchange Commission, the regulatory agency that oversees our activities.

If you prefer that we not disclose non-public, personal information about you to non-affiliated third parties, (other than those disclosures permitted by law) or to GRP Investment Advisory Representatives for use in their other businesses, you may opt out of those disclosures that is, you may direct us not to make those disclosures. If you wish to opt out of disclosures to non-affiliated third parties, you may write to the following address:

Global Retirement Partners, LLC  
4340 Redwood Highway, Suite B-60  
San Rafael, CA 94903  
415-526-2750

### **Disaster Preparedness/Business Continuity Plan**

GRP has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption, you cannot contact us as you usually do you should call our alternative number 415-526-2753.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our clients to transact business. 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.

### **Code of Ethics**

GRP has adopted a Code of Ethics (the "Code") which covers its employees, Investment Advisory Representatives and the registered and non-registered assistants of its Investment Advisory Representatives ("Covered Persons"). The Code requires that all Covered Persons conduct all business dealings in an ethical fashion, and encourages all Covered Persons to meet not only the technical requirements of the Code but also its spirit. Under the Code, Covered Persons have an affirmative duty of care, loyalty and honesty and must act in the best interests of their clients.

GRP's Code requires Covered Persons to comply with all federal securities laws. In addition, Covered Persons are prohibited from defrauding, misleading, or manipulating a client in any way in connection with the purchase or sale of a security. Further, Covered Persons may not favor the interests of one client over the other. In the course of normal business, Covered Persons may receive confidential information concerning clients and potential clients. The general rule, as discussed in the Code is that this information should never be communicated to anyone other than Investment Advisory Representatives, assistants, and employees of GRP who need to know, and where appropriate, to the participants involved in a specific transaction.

The Code has strict guidelines regarding personal securities transactions, designed to ensure that Covered Persons are not misusing their inside positions at clients' expense. Covered Persons are specifically prohibited from profiting personally, directly or indirectly, as a result of knowledge about a security or transactions. To enable GRP to monitor compliance with the Code, GRP requires that Covered Persons provide GRP with duplicate copies of confirmations and statements for accounts held at other financial institutions.

A copy of the Code of Ethics is available to clients upon request.