



ARMSTRONG ADVISORY GROUP

## PRIVACY POLICY

Effective: December 21, 2022

### **Our Commitment to You**

Armstrong Advisory Group Inc. (“AAG” 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. AAG (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.

AAG 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 may give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

#### **FACTS**

What does Armstrong Advisory Group, Inc. do with your personal information?

#### **WHY?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. 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.

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#### **Armstrong Advisory Group Inc.**

144 Gould Street, Suite 210, Needham, MA 02494

Phone: (781) 433-0001 \* Fax: (781) 433-0002

<https://armstrongadvisory.com>

## What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and date of birth
- Driver's license number and account information (including other institutions)
- E-mail address and investment experience, risk tolerance, income and expenses.

When you are *no longer* our customer, we continue to share your information as described in this notice.

## How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Armstrong Advisory Group chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Armstrong Financial Group share?	Can you limit this sharing?
<p><b>For our everyday business purposes —</b> solely to process your transactions, open, maintain and service your account(s) respond to court orders and legal investigations, or meet requirements of existing Laws, Rules and Regulations (including but not limited to Federal, State, U.S. Securities and Exchange Commission (SEC), respond to regulatory inquiries of the above-listed and other regulatory organizations, or report to credit bureaus.</p> <p>We also share your information with Charles Schwab &amp; Co., Inc. ("Schwab") – Schwab is providing trading, clearing and custody services to the vast majority of our customers.</p>	Yes	No
<p><b>For our marketing purposes —</b> to offer our products and services to you</p>	Yes	No
<p><b>For joint marketing with other financial companies</b></p>	No	We don't share.
<p><b>For our affiliates' everyday business purposes —</b> information about your transactions and experiences</p>	<p>Yes.</p> <p>Affiliated companies Armstrong Advisory Group, Inc. and Armstrong Insurance Group, Inc are operating utilizing identical technology, vendors and staff.</p>	No.

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<p><b>For our affiliates' everyday business purposes —</b> information about your creditworthiness</p>	<p>Yes.</p> <p>Affiliated companies Armstrong Advisory Group, Inc. and Armstrong Insurance Group, Inc are operating utilizing identical technology, vendors and staff.</p>	<p>No.</p>
<p><b>For our affiliates to market to you</b></p>	<p>Yes.</p> <p>Affiliated companies Armstrong Advisory Group, Inc. and Armstrong Insurance Group, Inc are operating utilizing identical technology, vendors and staff.</p> <p>Armstrong Advisory Group, Inc. and B1 Insurance Agency, LLC are affiliated by common company officer. Chief Compliance Officer of Armstrong Advisory Group, Inc. is an owner and an agent of B1 Insurance Agency, LLC.</p>	<p>Yes</p>
<p><b>For non-affiliates:</b></p> <p><b>Chicago Clearing Corporation (“CCC”) –</b> Armstrong Advisory Group, Inc. engaged CCC to provide class action litigation monitoring and securities claim filing services in order to assist our clients with the proliferation of securities class action litigations and filing process as well as to maximize potential recovery of such claims for our clients</p> <p><b>Tamarac (Investnet Asset Management):</b> <b>Armstrong Advisory Group, Inc</b> engaged Advent to provide portfolio and performance reporting. Advent receives a daily holdings data feed.</p> <p><b>RightCapital, Inc. Armstrong Advisory Group, Inc</b> engaged RightCapital, Inc. to provide financial planning software services. RightCapital, Inc. receives a daily holdings data for certain customers.</p>	<p>Yes</p>	<p>Yes</p>
<p><b>For non-affiliates to market to you</b></p>	<p>No</p>	<p>We don't share.</p>

## Who we are

<b>Who is providing this notice?</b>	Armstrong Advisory Group, a registered investment adviser.
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## What we do

<b>How does Armstrong Advisory Group protect my personal information?</b>	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. In addition, our technology vendors provide security and access control over personal information and have policies relating to data transmission.
<b>How does Armstrong Advisory Group collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"><li>■ Open an account or provide account information</li><li>■ Discuss your account or seek advice about investments</li><li>■ Tell us about your investment or retirement portfolio</li><li>■ Enter into an investment advisory contract with us</li></ul>
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"><li>■ sharing for affiliates' everyday business purposes — information about your creditworthiness</li><li>■ affiliates from using your information to market to you</li><li>■ sharing for non-affiliates to market to you</li></ul> State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

## Definitions

<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"><li>■ <b>Armstrong Advisory Group is affiliated with Armstrong Insurance Group, Inc. and with B1 Insurance Agency, LLC (by common officer only),</b></li></ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"><li>■ <b>Armstrong Advisory Group does not share with non-affiliates so they can market to you.</b></li></ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"><li>■ <b>Armstrong Advisory Group doesn't jointly market.</b></li></ul>

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## Other important information

This privacy notice has been prepared in accordance with federal law consistent with the Gramm-Leach-Bliley Act (GLBA). You may have other privacy protections under state laws. To the extent these state laws apply, we will comply with them with regard to our information disclosure practices.

Since the enactment of GLBA, there has been considerable activity in state legislatures on financial privacy issues. Some states have laws that are even more protective of consumer privacy than under GLBA. For example, certain states have adopted a requirement for you to approve the sharing of information in advance, otherwise known as an “opt-in” choice. If you live in an “opt-in” state (e.g., California, Massachusetts, Maine, Alaska, North Dakota or Vermont), then we will require your consent to share your information with unaffiliated third parties who are not servicing your account. State requirements vary and may change without notice.

Please note that, in order to comply with applicable laws and legal requirements, we may disclose information to government entities, self-regulatory organizations, or other third parties in response to court orders, subpoenas, government inquiries, or other mandatory legal processes.

## State-Specific Regulations – Massachusetts Opt - In

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.

## Questions?

Please contact Armstrong Advisory Group’s Chief Compliance Officer, Leonid Berline for any inquiries regarding Armstrong Advisory Group’s Privacy Policy.

**Leonid Berline**  
**Chief Compliance Officer**  
**144 Gould Street**  
**Suite 210**  
**Needham, MA 02494**

T: 781.433.0001.  
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