

FACTS	WHAT DOES JEMMA FINANCIAL SERVICES 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.
WHAT?	<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"> • Social Security Number and Income • Investment Experience and Assets • Employment Information and Risk Tolerance <p>When you are no longer our customer, we only share your information as described below in item 1 of this notice.</p>
HOW?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information, the reasons Jemma Financial Services chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Jemma Financial Services share?	Can you limit this sharing?
1. For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, report to credit bureaus	YES	NO
2. For our marketing purposes – to offer our products and services to you	NO	We don’t share
3. For joint marketing with other financial companies	NO	We don’t share
4. For our affiliates’ everyday business purposes – information about your transactions and experiences	NO	We don’t share
5. For our affiliates’ everyday business purposes – information about your creditworthiness	NO	We don’t share
6. For non-affiliates to market to you	NO	We don’t share

WHO WE ARE

Who is providing this notice?	Jemma Financial Services
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WHAT WE DO

How does Jemma Financial Services protect my personal information?	<p>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.</p> <p>We maintain safeguards that comply with federal standards to protect nonpublic personal information of our customers, including procedures to assure appropriate access to, and use of, information about our customers.</p>
How does Jemma Financial Services collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none">• Seek advice about your investments <u>OR</u> enter into an investment advisory contract• Show your driver's license <u>OR</u> give us your contact information• Tell us about your investment or retirement portfolio <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none">• Sharing for affiliates' everyday business purposes – information about your creditworthiness• Affiliates from using your information to market to you• Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

DEFINITIONS

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Jemma Investment Advisors, LLC is affiliated with Harborside Sales Group, LLC and Cromwell Investment Advisors, LLC.</i></p>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Jemma Financial Services does not share with non-affiliates so they can market to you.</i></p>
Joint Marketing	<p>A formal agreement between non-affiliated financial companies that, together, market financial products or services to you.</p> <p><i>Jemma Financial Services does not jointly market.</i></p>