



# Orion Capital Management LLC

## Privacy Policy

Effective Date April 27, 2022

Orion Capital Management LLC (hereafter “Orion”) recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We carefully guard the information you share with us. Orion will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. Orion will provide this privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

### Why We Collect Your Information

We gather information about you so that we can:

- Design and implement the investment and financial planning services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

### What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

### What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our custodian or independent contractors we hire.



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“Opting-Out” of Third Party Disclosures: If you do not want your Financial Adviser to retain copies of your personal information should he or she leave Orion to join another firm, you may contact us at 619-319-0520 to let us know.

Otherwise, Orion will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies or independent contractors not affiliated with Orion will be subject to confidentiality agreements.

### How We Protect Your Personal Information

Your privacy is important to us. We limit access to client information to only those who need to use it to carry out their business duties. We maintain physical, electronic, and procedural safeguards to protect your personal information.