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### **PRIVACY NOTICE 2023**

Elgethun Capital Management Inc., (ECM) a Registered Investment Advisory Firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. Records include all personal information in connection with any of the services provided by ECM. We do not disclose information to nonaffiliated third parties, except by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. Our policy with respect to personal information about you is listed below:

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transaction on your behalf, or discussions with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted by law.
- We do not provide your personally identifiable information to mailing vendors or solicitors for any purpose.
- Personally identifiable information about you may be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

ECM will continue to protect client data by limiting physical access and network access to confidential information.

Sincerely,

John A. Barker  
Chief Compliance Officer