

## Disclosure to Customers

**Privacy Statement** We collect non-public personal information about you from the following sources: Information from your application or other forms; information about your transactions with our affiliates, others; or us and information we may receive from consumer reporting agency. We do not disclose any nonpublic personal information about our customers or former customers to any one, except as permitted by law. We restrict access to your personal and account information to those employees and our affiliates who need to know that information to provide products and services to you. We maintain physical, electronic, and procedural safeguards to guard your non-public personal information.

**Business Continuity** During times of local or national emergencies, the office may be closed and every attempt to return to normal business operation will be made. Our Business Continuity Plan addresses varying degrees of business disruption. Telephone calls to the office's main telephone number will be forwarded to a remote location for handling. To access your account funds or positions, please dial 203-302-7300 or check our website for alternative access information. Our Business Continuity Plan is subject to modification and any updates are available upon request. If a customer would like to receive a copy of our plan please send a written request to Tourmaline Partners, LLC, 680 Washington Blvd., 10<sup>th</sup> Floor, Stamford, CT 06901.

**Customer Identification Program** Important Information About Procedures for Opening a New Account: To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

**FINRA BrokerCheck** FINRA BrokerCheck, allows investors to learn about the professional background, business practices, and conduct of FINRA member firms or their brokers. The telephone number of FINRA BrokerCheck is 800-289-9999, the website address <http://www.finra.org>. An investor brochure is also available upon request.

**Complaints** Complaints regarding your account may be directed to the Tourmaline Partners, LLC, , 680 Washington Blvd., 10<sup>th</sup> Floor, Stamford, CT 06901; Attention Compliance Department. The telephone number is 203-302-7300.

**FINRA Rule 2270** The Statement of Financial Condition is available to the firm's customers. If you would like to request a copy please do so in writing and contact Tourmaline Partners, LLC, 680 Washington Blvd., 10<sup>th</sup> Floor, Stamford, CT; Attention Compliance Department.

**FINRA Rule 2342** You may obtain more information about the Securities Investor Protection Corporation (SIPC) coverage on your brokerage account by contacting the firm or requesting a SIPC brochure. SIPC's website is [www.sipc.org](http://www.sipc.org) and the telephone number is 202-371-8300.

**SEC Rule 606** The Company shall, on request and free of charge, disclose the identity of the venue to which your orders were routed for execution in the six months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the transactions, if any, that resulted from such orders. Additional information may be found at: [sec.gov/tm/faq-rule-606-regulation-nms](http://sec.gov/tm/faq-rule-606-regulation-nms)

**Tourmaline Partners, LLC is a member of FINRA and SIPC. Tourmaline Partners, LLC is exempt from the requirement to hold an Australian financial services license under the Corporations Act 2001 (Cth) in respect of financial services performed. Tourmaline Partners, LLC is regulated by the Securities and Exchange Commission under United States laws which differ from Australian laws.**

## Privacy Policy

The Securities Exchange Commission's adoption of Regulation S-P, the "privacy rules" promulgated under Section 504 of the Gramm-Leach-Bliley Act, requires all broker-dealer firms to provide all of its customers and consumers a disclosure statement, outlining the firm's procedures and policies regarding the safeguarding of "non-public personal information" that is obtained during the normal course of business.

Tourmaline Partners, LLC understands your Privacy is important and the firm has always been committed to maintaining your confidentiality. This notice will help you understand what types of non-public personal information we may collect, how we use it and how we protect your privacy. We recognize that you expect your personal information to be handled in a professional, confidential manner and we have adopted the following policies to safeguard your privacy and to explain the circumstances, under which we may collect, maintain and use any non-public personally identifiable information that you provide us.

We collect information about you to help us serve your financial needs, provide customer service, offer new products or services, and fulfill legal regulatory requirements. The type of information we collect may include:

- Information we receive from you on applications or other forms (for example, your name, address, social security number, assets and income).
- Information about your transactions with us or others (for example, your account balance, payment history, or parties to transactions).
- Information that we receive from a consumer reporting agency such as your creditworthiness and credit history.

We do not share non-public personal information about you with unaffiliated third parties with whom we have no contractual business relationship for their independent use unless (1) you give us permission, (2) it is necessary to complete a transaction on your behalf, (3) it is necessary to protect you against fraud, comply with a subpoena or other court order or is otherwise required or permitted by law. We do not sell information about you to outside unaffiliated companies.

Furthermore, we restrict access to your personal and account information to those employees who need to know that information to provide products and services to you and maintain strict physical, electronic, and procedural safeguards to guard your nonpublic personal information.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change these privacy policies at any time. You will receive appropriate notice of changes to our Privacy Policy.

Questions concerning this Privacy Policy may be directed to us at 203-302-7300, or by e-mail at [jg@tourmalinellc.com](mailto:jg@tourmalinellc.com).

## **Business Continuity Planning**

Tourmaline Partners, LLC has developed a Business Continuity Plan which describes 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.

### **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 customers 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.

Our business continuity plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Goldman, Sachs & Co. retains a back-up of many of our important records. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that their objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within one business day. Your orders and requests for funds and securities could be delayed during this period.

### **Varying Disruptions**

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within one business day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within one business day. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site ([www.tourmalinellc.com](http://www.tourmalinellc.com)). If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their records.

### **Contacting Us**

If after a significant business disruption you cannot contact us as you usually do at 203-302-7300 please call our emergency number(s) at (203) 722-5727 or (914) 450-7298.

If you have questions about our business continuity planning, you can contact us at 203-302-7300.