

## PRIVACY POLICY DISCLOSURE

**BLUE OCEAN STRATEGIC CAPITAL, LLC**  
**443 North Franklin Street, Suite 220**  
**Syracuse, NY 13204**

December 10, 2009

BLUE OCEAN STRATEGIC CAPITAL, LLC. realizes our relationship with you is our most important asset. We are committed to providing you with high quality service and advice. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust.

### INFORMATION THAT WE COLLECT

The categories of information that we collect from a client depend upon the scope of the client engagement. The information that is obtained from applications, interviews, phone calls and forms completed when requesting our services may include such items as your name, address, social security number as well as:

- For investment, insurance and annuities – income, tax rate, net worth and financial objectives and name of beneficiaries;
- For financial planning, consulting and other investment advisory services – income, spending habits, investment objectives, financial goals, statements of account and other records concerning your financial and other assets including employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns;
- For life, disability income, and long term care insurance and certain annuities – information regarding your health or the health of the insured or annuitant.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

BLUE OCEAN STRATEGIC CAPITAL, LLC. will not share information with affiliated or nonaffiliated companies unless you have given us **written** permission, or if it is necessary to maintain or service your account. Federal law allows us to share the types of information described above in the circumstances below:

- We may share your information with companies that we hire to perform necessary account-servicing functions at our direction to manage and maintain your account.
- We may use certain nonaffiliated companies to perform services on our behalf and at our direction to help us communicate with you, or to help us offer or provide you with products or services in connection with your account.
- We may share your information as permitted by law to comply with subpoena or summons, review of professional practice in conjunction with prospective purchase, sale, or merger provide appropriate confidentiality steps are taken, or participating in threatened or pending legal action either initiated or pending against us, etc.

In these circumstances we have written agreements that require the parties we are sharing your information with to keep it safe and confidential and to use it only for the purposes we specify.

**WE PROTECT THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION.**

- Companies that we have agreements with to provide services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.
- We restrict personal information to our employees and agents for business purposes only. All employees are required to safeguard such information.
- We maintain physical, electronic, and procedural safeguards to your personal information.

We afford prospective and former customers the same protections as existing customers with respect to the use of personal information.

We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date. If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.

We will provide notice of changes in our information-sharing practices if in the future disclosure of your personal information is not consistent with this policy. We will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

**IF YOU HAVE ANY QUESTIONS OR CONCERNS, PLEASE CONTACT TED SARENSKI AT (315) 471-2672.**