

O'Keefe Stevens Advisory, Inc.

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Privacy Policy

O'Keefe Stevens Advisory, Inc., a registered investment advisory and financial planning firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. The records we maintain include all personal information that we collect from you in connection with any of the services provided by O'Keefe Stevens Advisory. We have never disclosed information to non-affiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in our Firm's policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals and have established the following procedures to mitigate any real or perceived infringements of your rights of privacy:

- We limit access to your information by our associated persons to only: 1) those who have a business or professional reason for knowing; 2) non-affiliated parties as permitted or required 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 transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or attorney.); or 3) those required by judicial or regulatory process.
- We maintain a secure office and computer environment to ensure your information is not placed at unreasonable risk.
- The categories of non-public personal information that we collect from clients depend upon the scope of the client's engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties and information from consumer reporting agencies, if obtained.
- For unaffiliated third parties that require access to your personal information, including financial services companies, consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators may also review Firm records as permitted by law.
- The disclosure information contained in any document completed by the client for processing and/or transmittal by O'Keefe Stevens Advisory in order to facilitate the commencement, continuation or termination of a business relationship between the client and a non-affiliated third party service provider (i.e., broker/dealer, investment advisor, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for O'Keefe Stevens Advisory (i.e., advisory agreement, Investment

Policy Statement, other client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third party service provider.

- We do not provide personally identifiable information to mailing list vendors or solicitors for any purpose, at any time. Personally identifiable information about you will be maintained during the time you are our client, for the required time thereafter that such records are required to be maintained by federal and/or state securities laws and regulations and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.
- Recognizing the expanded use of Internet and technology-based devices in providing advisory services to clients, O’Keefe Stevens Advisory is committed to protecting your personal information from unauthorized access or use through these avenues. We seek to use reasonable organizational, physical, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If at any time you have reason to believe that your interaction with us may have been compromised or is no longer secure, please immediately contact Peter S. O’Keefe, our Firm’s Chief Compliance Officer. Your concerns will be promptly investigated and you will be notified of the results.
- You also have a responsibility to help us protect your accounts by never revealing your user name or password to other individuals. In order to help us protect your personal information, it is important that you always keep your account information safe. Never share your personal ID, passwords or PINs with anyone, under any circumstances.
- In providing advisory services to you, O’Keefe Stevens Advisory may, in the context of certain telephone and/or in-person discussions, request your full Social Security number, account number or other information to verify your identity before conducting actions you have requested. For example, we may ask for such information to verify your identity when you place a call to us or when we call you. To aid in preventing identity theft, however, we will never request that you disclose your personal IDs, passwords or PINs under any circumstances. Additional information regarding identity theft and the steps you can take to help protect yourself from fraud can be found on the Federal Trade Commission website, www.ftc.gov.