

**Stark Financial Advisers, Inc.**  
730 South Federal Highway  
Lake Worth Beach, FL 33460

## **Stark Financial Advisers - Privacy Policy**

### **Protecting Your Privacy**

Dear Client:

At **Stark Financial Advisers, Inc.** (“SFA”) we appreciate the trust that clients place in us and we recognize the importance of protecting the confidentiality of non-public personal information that we have in our possession. The information is used to ensure accuracy in reporting and record keeping and to carry out requested transactions. Keeping this information secure is a top priority for SFA and in keeping with recently adopted regulations, we share our Privacy Policy for clients.

This **Privacy Policy applies to all of our current and former clients.** This notice is to inform our clients of the recent legislation requiring Advisory firms to inform their clients of the processes used in collecting, maintaining and the protection of information received from clients (Regulation S-P, Privacy of Consumer Financial Information). In addition to the required initial notice, we provide our Privacy Policy to clients when they open a new account and on a yearly basis thereafter. Our Privacy Policy can also be viewed on our web site [www.starkadvisers.com](http://www.starkadvisers.com).

**Commitment to Your Private Information:** SFA, along with **R.M. Stark & Co., Inc.** (“RMST”) has a policy of protecting the confidentiality and security of information we collect about our clients. We do not, and will not, share non-public personal information (“Information”) about you with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it.

**Why We Collect and How We Use Information:** We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, and providing the advisory services described in our Form ADV.

**How We Gather Information:** We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (*i.e.*, name, address, social security number, birth date, assets, income, financial history);
- Transactional activity in your account (*i.e.*, trading history and account balances);
- Information services and consumer reporting sources *i.e.*, to verify your identity or to assess your credit history);
- Other sources with your consent (*i.e.*, your insurance professional, attorney, or accountant).

**How We Protect Information:** Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including

termination from employment with us. We also maintain physical, electronic, and procedural safeguards to protect Information, which comply with applicable SEC, state, and federal laws.

**Sharing Information with Other Companies Permitted Under Law:** We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing Information to unrelated third-parties who need to know such Information in order to assist us with the provision of services to you. Unrelated third-parties may include broker/dealers, mutual fund companies, insurance companies, and the custodian with which your assets are held. In such situations, we stress the confidential nature of Information being shared.

**Former Clients:** Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your non-public Information with strict confidentiality.

If you have any questions concerning SFA's Privacy Policy privacy policy, or concerns about your personal Information, please feel free to contact the Compliance Department.

**Opt-Out Provisions:** Since SFA shares non-public Information solely to service client accounts, SFA does not disclose any non-public personal Information about SFA's clients or former clients to anyone, except as permitted by law. However, SFA may also provide client Information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third-parties in response to subpoenas. In the event that SFA has a change to its Privacy Policy that would allow it to disclose non-public Information not covered under applicable law, SFA will allow its clients the opportunity to opt out of such disclosure.

**Permission to share information with a non-affiliated third-party:**

Certain States have laws prohibiting Stark Financial Advisers, Inc. from sharing any of your personal Information with a third-party without your permission. You have a right not to permit us to share this Information with anyone else. As a registered investment adviser, in order for us to provide financial services and service your accounts, you must check the "yes" box below if you consent to our sharing such Information. You must then complete, sign and return the form to our firm.

Consent granted:     Yes             No

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

SEC Registered Investment Adviser