BAY CAPITAL PRIVACY POLICY

At Bay Capital we are committed to protecting your privacy and the confidentiality of your personal and financial information. Pursuant to the requirements of the Gramm-Leach-Bliley Act (GLBA), Bay Capital has taken the following measures to keep your personal information private and secure.

How We Protect Confidentiality

Bay Capital/Calton uses procedural, physical and electronic systems safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities.
When we enter into agreements with other companies to provide services to us, or to make products and services available to you, we include a confidentiality clause. Under such an agreement, these companies may receive information about you, but they may only use it for the intended purpose – to benefit you.

Persons Covered by the Privacy Policy

The Bay Capital Privacy Policy applies to anyone who is a current or former Bay Capital client, including those customer accounts of correspondent and independent broker dealers, or who registers with one of our services or promotional offers. We provide you with a copy of this policy when you open an account and we send you annual notification thereafter. If we materially change our policy regarding sharing of information, we will notify you in advance and give you the opportunity to opt out of such disclosure.

How We Obtain Information About You

In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as nonpublic personal information, may be collected from several sources, including applications and other forms that you file with us (e.g. name, assets, income), records of transactions with us, our affiliates, non-affiliated third parties and others (e.g. credit report). Because we strive to provide you with best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact your account representative or Bay Capital directly if you need to correct or update your personal information.

Sharing Information – With Whom and Why

Bay Capital does not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial service choices. We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies:

- We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s) such as Calton & Associates, Inc., Hilltop Securities, Inc., E*TRADE Advisor Service, Insurance companies and various investment companies (mutual funds) that we may place your investment with.
- We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with securities regulators or law enforcement authorities, to resolve disputes, or to authenticate checks.
- Bay Capital has multiple affiliates and selling agreements with numerous mutual fund companies and others. The sharing of your information among our affiliates enables us to serve you more efficiently and makes it more convenient for you to do business with us. We are permitted by law to share information with our affiliates about your account history and your experiences with us. All our affiliates follow similar privacy policies.

Internet Security

Bay Capital's website does not offer any client account information. Clients who can access their accounts online through Hilltop Securities, E*TRADE Advisor Services or a mutual fund company are required to log on with their user name and individually selected password. Your password is known solely to you, the client, and should never be shared with anyone. You may change your password often as you wish. Each time you access your account, please don't forget to logoff when you are finished. This will prevent someone else from accessing your account if you leave your computer and your session hasn't automatically shut down.
Bay Capital's associates and operations personnel use information about you to respond to your needs and provide you with information about specific products in which you may have an interest. We instruct our employees to use strict standards of care in handling the personal, confidential information of customers and remind them on a regular basis of their obligation about the confidentiality of customer information.
Additionally, Bay Capital will use shredding machines, locks and other appropriate physical security measures to safeguard client information stored in paper format.

Privacy Notice Delivery

1. Initial Privacy Notice – As regulations require, all new customers receive an initial Privacy Notice at the time when the customer relationship is established.
2. Annual Privacy Notice – The GLBA regulations require that disclosure of the Privacy Policy be made on an annual basis. Bay Capital will deliver its annual Privacy Notice in conjunction with the annual offer of its Form ADV Part II.

Change Notices

If for any reason at any time in the future, we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure. If you have any questions or concerns, please contact us or your representative at the address listed below.

Disclosure

Advisory services offered through Bay Capital 4100 W. Kennedy Blvd., Suite 305, Tampa, FL 33609 Phone (813) 286-1553. Securities offered through Calton & Associates, Inc., 2701 N. Rocky Point Dr., Suite 1000, Tampa, FL 33607 (813) 264-0440. Bay Capital and Calton & Associates, Inc. are separate entities.