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Privacy Policy

Gyroscope Capital Management Group, LLC (“Gyroscope Capital”) is an investment advisor providing wealth management products and services to our customers. As a firm, we have always valued the trust our customers have placed in us and are committed to the responsible management, use, and protection of their personal information. This Notice applies to Gyroscope Capital and its subsidiaries and describes not only the personal information we collect, but also how we handle and protect it. As part of our normal business practices, we distribute our policy annually or when significant changes are made to it.

Collecting Information

Gyroscope Capital Management Group, LLC collects personal information about you to help us serve your financial needs, process transactions in your account(s), provide customer service, offer new products and services, and fulfill legal and regulatory requirements.

Gyroscope Capital collects nonpublic information from you, as well as from other sources. The sources and the information collected may include:

Information you provide to us, to our affiliated entities, to your advisor on applications and related forms, or through discussions with our customer service staff, such as address, social security number, birth date, net worth, assets, income, and medical information, if applying for insurance. Information regarding your transaction history with us, such as products or services purchased, account balances, trading history, and payment history, as well as information from information service companies and consumer reporting agencies, such as your transactions or credit relationships with unaffiliated third parties.

Information from other unaffiliated third parties, including employers, associations, benefit plan sponsors, and other institutions, if you transfer positions or funds to Gyroscope Capital.

Sharing Your Information

We may disclose any of the nonpublic personal information that we collect about you, as required to conduct our business and as permitted or required by law. We may share information about our customers with our affiliated financial services providers, such as insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing you with product options, account maintenance and/or customer service. We also may share your information with regulators and law enforcement organizations, or



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— MANAGEMENT GROUP —

in response to a subpoena or discovery request, as permitted or required by law. We do not sell, share, or disclose your nonpublic personal information to unaffiliated third-party marketing companies.

Safeguarding Your Privacy

Gyroscope Capital recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Gyroscope Capital authorizes access to your nonpublic information only to personnel who need that information to serve you. We maintain, physical, electronic, and procedural safeguards regarding your nonpublic personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. 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. If your advisor leaves Gyroscope Capital to join another investment advisor, we will obtain your affirmative consent before allowing him or her access to your Gyroscope account information. In the event Gyroscope Capital enters into an agreement with a new clearing firm, we reserve the right to transfer customer accounts to the new clearing firm and may share your personal and account information with the new clearing firm in order to facilitate the transfer of your assets.

Opt Out Provision

If you wish to opt out of these disclosures, now or at any time in the future, please contact our Compliance department at 1-800-426-0501 except for clients in Massachusetts. The Commonwealth of Massachusetts requires that clients must affirmatively opt-in to our disclosure provisions. However, please note that if you direct us not share your personal information with our affiliated financial services providers, we may still share your personal information to the extent permitted by law to process transactions and/or to service your accounts. If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers.

Questions

If you have any questions after reading this privacy policy, we encourage you to contact your registered representative or to write to Privacy Management, c/o Compliance Department, Gyroscope Capital 111 Devonshire Street, Boston, MA 02109