



Bluefin Investment Management, LLC

Privacy Policy

It is the policy of Bluefin Investment Management, LLC, (Bluefin) to protect the confidentiality and security of information we collect about our customers. Non-public information ("Information") about you will not be shared with third parties without your consent, except for the specified purposes described below. This notice describes the information we may gather from you and the circumstances under which we may share it. Our clearing firm, Scottrade, has separate privacy policies, which explain their privacy practices.

Bluefin limits the collection and use of information to the minimum required to offer and deliver products and services to you. Such services include maintaining your account(s), processing transactions and administering our business.

The types of information we may collect during the normal course of business include: information provided in applications, forms, questionnaires and investment management agreements. This information may be gathered in written or verbal form, dependent upon applicable state and federal laws and regulations. Personal information we may collect could include but is not limited to your name, address, phone number, account information, social security number, employment, assets, income and debt levels; information regarding transactions, accounts, balance information; trading activity and parties to transactions; information from other outside sources, health and beneficiary information, and any other information that is deemed to be nonpublic personal information as defined by Gramm-Leach-Bliley Act and the SEC Privacy Rule (Regulation S-P).

Employees are required to protect the confidentiality of information and to comply with established policies. They may access information only when there is an appropriate reason to do so, such as to administer our products and services. We also maintain physical, electronic and procedural safeguards to protect Information that comply with applicable laws. Violation of our Privacy Policy may be subject to disciplinary action. In addition, we maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.

We may disclose any information to, or as directed by our clearing firms, or when we believe it necessary for the conduct of our business, or where required by law. Information may be disclosed for audit and research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help us prevent fraud or money laundering. We will not make any disclosures of information to other companies who may want to sell their products or services to you. We do not sell customer lists, and we will not sell your name to another company for marketing purposes.

Please contact us if you desire to review any file we may maintain of your personal information. If you notify us that the information is incorrect, we will review it and amend our records if appropriate. If we do not agree that the information is incorrect, you may submit a short statement of dispute, which we will include in future disclosures of the disputed information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations, and they are not intended to be exclusive. This notice complies with SEC regulations regarding consumer privacy. You may have additional rights under other foreign or domestic laws that may apply to you.



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