

Notice of Privacy Policy

What is the purpose of this Notice of Privacy Policy?

This privacy notice is provided for informational purposes only. You do not need to call or take any action in response to this notice. It is provided to you by Champion Capital Corporation (“Champion Capital”), a registered securities broker/dealer and a registered investment adviser and also on behalf of Legacy Trust Advisors, the registered investment advisor division of Champion Capital. We are providing you this Notice of Privacy Policy in compliance with the Securities and Exchange Commission’s (SEC) Privacy of Consumer Financial Information rule (commonly known as “Regulation S-P”). Actually, the loose standards of privacy specified in this law fall far short of those we have imposed upon ourselves for decades.

How do we safeguard your nonpublic personal information?

We understand that your privacy is important. We cannot overemphasize the high priority that our firm has always placed on maintaining the confidentiality of client information. Other than to those auditors, regulators, companies, and persons mentioned below with whom we work to provide services for you that you have requested, we do not even disclose your name.

- We restrict access to nonpublic personal information about you to those employees and service providers who need the information in order for us to provide the services and products that you have asked us to provide you.
- We have policies and procedures in place that give direction to our employees, agents, and representatives regarding how to protect and use nonpublic personal information.
- Discarded documents containing even a client’s name are carefully shredded.
- We maintain the same privacy protection for former clients as we do for current clients.

What information do we know about you?

We gather the following types of nonpublic personal information about you:

- Information that you provide to us in discussions about your goals and objectives, family members, income, assets and liabilities, taxes, etc.
- Information we receive from you on various applications and other forms.
- Information about your advisory services, brokerage transactions, and insurance coverage with us, our affiliates, and third parties not affiliated with us that are used by us to provide services to you.
- Your health history when insurance is purchased through our firm.

To whom do we disclose your nonpublic personal information?

We disclose selected nonpublic personal information about you from the above categories to the following, only when needed:

- The companies and/or individuals you authorize us to work with in providing services and products for you, for example, the custodian for your brokerage and/or advisory account, your trustee, mutual fund companies, private investment managers, accountants, attorneys,

insurance companies, their representatives, etc. The categories of information listed above may be disclosed pursuant to agreements we have with such service providers.

- Companies and personnel affiliated with Champion Capital such as other members of the Champion Group of Companies, but the affiliate may only disclose information to the same extent as Champion Capital.
- We would also be required to disclose information in response to a subpoena or similar legal process, except for clients whose relationship with us is protected by “attorney-client privilege.”
- Auditors and regulators.

Except for auditors and regulators where we are required by law to disclose certain types of information, it is not our practice to disclose nonpublic personal information except with your knowledge and prior written approval. We do not sell any information about our clients.

Our privacy policy applies to agents and representatives.

Our privacy policy applies, to the extent required by law, to our agents and representatives when they are acting on our behalf. Please note that there may be some instances when these same agents and representatives may not be acting on behalf of Champion Capital Corporation / Legacy Trust Advisors and obtain nonpublic personal information on their own behalf or on behalf of another. In those instances, our privacy policy would not apply.

What is the “Opt Out” Provision?

To protect ourselves from legal liability under the SEC’s Regulation S-P, we reserve the legal right to disclose any of the types of nonpublic personal information mentioned in this notice to anyone when we believe there is a good reason for doing so, we believe such disclosure is in your best interests and is consistent with your wishes. If you would prefer to limit our right to disclose such information only to those rights stipulated in the SEC’s Regulation S-P, you may “Opt Out” by filling in your name on the line below and mailing this notice back to us at Post Office Box 952259, Lake Mary, FL 32795. The only effect of your “Opting-Out” would be to prevent us from doing things that we do not do anyway since all information we disclose is permitted by SEC Regulation S-P even if you Opt-Out. However, we are now required by law to give you this right to “Opt-Out” and then to repeat this process annually. If we receive an Opt-Out Election from either party to a joint account, we will interpret this to be an Opt-Out by all joint account holders. For other than joint accounts, a separate Opt-Out Election is required for each account holder.

OPT ME OUT:

Signature

Date: _____

Printed Name

If you have questions about this Notice of Privacy Policy, call for more information.

Questions about Champion Capital / Legacy Trust Advisor’s privacy policy should be directed to Jack Champion. He can be reached at: (407) 330-2120.