

ACCOUNT CHARGES AND DISCLOSURES

Customer Account Fee Charges

San Blas Securities has a \$10.00 annual account fee charge. Additionally, domestic customers using Interactive Brokers as a clearing agent will be charged \$10.00 postage and handling fee per transaction and domestic customers using RBC as a clearing agent will be charged \$10.00 postage and handling fee per transaction. International customers, regardless of the clearing agent, will be charged \$10.00 postage and handling fee per transaction.

Business Continuity Plan

San Blas Securities ("the Firm") has developed a Business Continuity Plan on how the Firm will respond to events that significantly disrupt its business. Since the timing and impact, of disasters/ disruptions are unpredictable, the Firm will have to be flexible in responding to actual events as they occur. With that in mind, San Blas Securities is providing you with this information on its business continuity plan.

- **Contacting San Blas Securities**

If after a significant business disruption you cannot contact the Firm as you usually do at (404) 704-0406, you should call our Firm emergency number (631) 767-5123. If you cannot access the Firm through either of those means, you should contact the clearing firm that is custodian of your account, Interactive Brokers at 1-866-694-2757 or (203) 618-7791 or RBC at 1-800-769-2512 for instructions on how they may provide prompt access to funds and securities, enter orders and process other trade-related cash and security transfers transactions for your account.

- **San Blas Securities: Business Continuity Plan**

San Blas Securities plans to quickly recover and resume business operations after significant business disruptions and respond by safeguarding its employees and property, making a financial and operational assessment, protecting the Firm's books and records, and allowing its customers to transact business. In short, the Firm's business continuity plan is designed to permit the Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

San Blas Securities' Business Continuity Plan addresses data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternative physical locations of employees; critical suppliers, contractors, banks, and counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are able to continue our business.

San Blas Securities' clearing firms, Interactive Brokers and RBC, back up the Firm's important records in a geographically separate area. While every emergency situation poses unique problems based on external factors such as time of the day and the severity of the disruption, San Blas Securities has been advised by both of its clearing firms that their objectives are to restore their own operations and be able to complete existing transactions and accept new transactions and payments within four hours. Your orders and requests for funds and securities could be delayed during this period.

- **Varying Disruptions**

Significant business disruptions can vary in their scope, such as a single building housing the Firm, the business district where the Firm is located, the city where the Firm is located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimum to severe. In a disruption to only San Blas Securities or a building housing the Firm, San Blas Securities will transfer its operations to a local site when needed and expect to recover and resume business within four hours. In a disruption affecting San Blas Securities business district, city, or region, the Firm will transfer its operations to a site outside of the affected area and recover and resume business within 24 hours. In either situation, San Blas Securities plans to continue in business, transfer operations to its clearing firms (if necessary), and notify you through U.S. Postal Mail, electronic mail (email), or our customer emergency number (631) 767-5123. If the significant business disruption is so severe that it prevents San Blas Securities from remaining in business, the Firm will assure our customers prompt access to their funds and securities.

PRIVACY POLICY

Our Commitment to Your Privacy

San Blas Securities has a longstanding policy of protecting the confidentiality and security of information we collect about customers. San Blas Securities will not share nonpublic information about you ("Information") without your consent, except for specific purposes described below. This notice describes the Information San Blas Securities may gather and the circumstances under which the information may be shared.

Why San Blas Securities Collects Information and How San Blas Securities Uses Information:

San Blas Securities limits its collection and use of confidential information to what is required. Additionally, we distribute that confidential information on a need-to-know basis. Maintaining your accounts with San Blas Securities, processing transactions through our clearing firm, and utilizing vendors whom have signed non-disclosure confidentiality agreements and other entities administering San Blas Securities' business are examples of those of a need-to-know basis.

How San Blas Securities Gathers Information

San Blas Securities gets most information directly from you through forms you complete when you apply for, access, and use financial products and services offered by San Blas Securities. San Blas Securities may verify this information or get additional information from consumer reporting agencies or public sources.

Information San Blas Securities Obtains

Customer Information. Customer information includes: name, address, telephone number, social security number, and other demographic data about you. It also includes information about your transactions with us such as the type and value of investments that you own.

Financial Information. Financial information (covered by the Fair Credit Reporting Act) includes information such as your credit history, income, assets, investment objectives, investment experience, and type and value of other investment products you own or for which you have applied.

How San Blas Securities Protects Information

San Blas Securities employees are required to protect the confidentiality of Information and to comply with our established policies. San Blas Securities employees may access Information only when there is an appropriate reason to do so, such as to administer the firm's products or services. San Blas Securities also maintains physical, electronic and procedural safeguards to protect Information, which comply with all applicable laws. Employees who violate our Privacy Policy are subject to disciplinary process.

Disclosure of Information

San Blas Securities may disclose any Information when the Firm believes it is necessary for the conduct of its business, or where law requires disclosure. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help prevent fraud. In addition, the Firm may disclose Information to third-party service providers, as well as affiliates (i) to enable them to provide business services for San Blas Securities, such as performing computer related data maintenance or processing services for our firm, (ii) to facilitate the processing of transactions requested by you, (iii) to assist San Blas Securities in offering products and services to you, or (iv) for credit review and reporting purposes.

We may disclose non-public personal information about you in connection with the transfer of your account to another financial institution at your request or the request of your representative.

Former Customers

Our Privacy Policy is the same for current as well as former clients.

Disclosure Document & Privacy Policy



Fiduciary Acknowledgement for IRA Accounts

When San Blas Securities, LLC; San Blas Advisory, Inc.; or SB Advisory, LLC, (“we”) provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/ or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Put your financial interests ahead of ours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

For more information about our services, compensation, and additional information about conflict of interest, please see other disclosure documents including, but not limited to Form CRS, Investment Adviser Brochures (ADV), and Regulation Best Interest Disclosures, as applicable.

Further Information

San Blas Securities reserves the right to change this Privacy Policy at any time without prior notice. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with enacted Federal Law and SEC regulations regarding your privacy. You may have additional rights under other foreign or domestic laws that may apply to you. For additional information, contact the San Blas Securities Compliance Department at (404) 704-0406.

CUSTOMER IDENTIFICATION NOTICE

The firm requests confidential information from you in order to verify your identity and in an effort to prevent terrorism. The United States Treasury Department demands that we determine the background and intentions of our potential customers.

Signature: _____

Print Name: _____

Date: _____

Account #: _____