

FACTS**WHAT DOES UPSTATE ADVISERS INC. DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and financial information
- Account balances and assets
- Account statements and trade tickets

How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Upstate Advisers Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Upstate Advisers Inc. share?	Can you limit this sharing?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes—to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	Not Applicable
For our affiliates' everyday business purposes—information about your transactions and experiences	No	Not Applicable
For our affiliates' everyday business purposes—information about your creditworthiness	No	Not Applicable
For our affiliates to market to you	No	Not Applicable
For nonaffiliates to market to you	No	Not Applicable

Questions?

Call 585-209-9788 or go to www.upstateadvisers.com

Who we are

Who is providing this notice?	Upstate Advisers Inc.
--------------------------------------	-----------------------

What we do

How does Upstate Advisers Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Upstate Advisers Inc. collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ➤ Open an account, transfer accounts, link bank accounts or enter trades ➤ Discuss financial planning ➤ Seek advice about investments ➤ Talk to us about your investment & retirement accounts
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ➤ Sharing for affiliates' everyday business purposes—information about your creditworthiness ➤ Affiliates from using your information to market to you ➤ Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ➤ We do not share with our affiliates
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ➤ We do not share with our affiliates
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ➤ We do not share with our affiliates

A copy of our **Form ADV** is available at our website, www.upstateadvisers.com.
You can also contact us at any time and we will mail you a copy.