

# Atlanta Capital Group

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May 19, 2016

This Brochure provides information about the qualifications and business practices of Atlanta Capital Group. If you have any questions about the contents of this Brochure, please contact us at (404) 893-4100. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Atlanta Capital Group is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. This Brochure is intended, in part, to provide information which can be used to make a determination to hire or retain an Adviser.

Additional information about Atlanta Capital Group is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

This is an initial ADV Part 2A brochure. As such, there are no material changes to report. Additional information about Atlanta Capital Group is also available via the SEC’s website, [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC’s website also provides information about persons affiliated with Atlanta Capital Group who are registered, or are required to be registered, as investment advisor representatives of Atlanta Capital Group.

Our Brochure may be requested by contacting us at (404) 893-4100 or by emailing [compliance@atlantacapitalgroup.com](mailto:compliance@atlantacapitalgroup.com).

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#### **Item 4 – Advisory Business**

Atlanta Capital Group (“ACG”) was established in 2009 and approved as a Registered Investment Adviser in June of 2009. David Millican, Jeffrey T. Shaver and Joseph Young are co-founders, Principals and Managing Partners with 33.33% ownership each.

This Brochure discusses the Separately Managed Accounts – Long/Short Strategy offered through ACG. ACG also offers Wealth Management services which are disclosed in a separate Brochure (Form ADV Part 2) which represents the majority of ACG’s business. Clients investing in the Advisory Managed Account Solutions, Portfolio Solutions or Plan Sponsor and Plan Participant Services will receive a separate Brochure. Clients opening accounts through National Financial Services, LLC (“NFS”), Fidelity Institutional Wealth Services (“FIWS”), or Charles Schwab & Co. (“Schwab”) should have received a separate Brochure. You may request a copy of the other Brochures by contacting the Compliance Department at our main number.

#### **Separately Managed Accounts – Long/Short Strategy**

This investment strategy seeks to invest in developed global equity markets using a hybrid approach which blends proprietary top-down macro-economic insight, quantitative screening, and rigorous bottom-up fundamental stock selection processes with a stringent tactical trading and risk management overlay.

The universe includes the top 1,300 global companies, by market-capitalization, domiciled in North America and Western Europe and Japan. The strategy uses a combination of instruments including, but not limited to: cash equity, equity options, equity index futures, foreign exchange, commodities, ETFs and sector specific equity trading vehicles.

Emphasis on long exposure to companies which are growing with strong fundamentals and free cash flow and short exposure to low-quality businesses with unstable business models and deteriorating operating & profitability metrics.

Combining factually-based macroeconomic detail with a disciplined value approach to stock selection which seeks to acquire assets that appear to be neglected relative to fundamental value and sell assets where over-exuberance exists relative to fundamental value can be employed in an aim to outperform the market over a full business cycle.

Its objectives are profit generation on the long and short side of the portfolio, preservation of investment capital and the delivery of consistent, high-quality, uncorrelated risk-adjusted returns while systematically controlling assumed portfolio risk.

As of March 2, 2016, ACG held \$801,580,240 in assets under management on a discretionary basis and \$309,157,992 on a non-discretionary basis.

#### **Item 5 – Fees and Compensation**

The specific manner in which fees are charged by ACG is established in a client’s written agreement. Fees are based on the assets in the account per the fee schedule and in some instances, may be negotiated. The Management Fee compensates our Investment Adviser Representative for the asset management services, investment advice and recommendations provided. The value of the assets will be based on information provided by the custodian of the assets, the client or other third party, as applicable. Clients generally instruct ACG to debit the fee from one of the client’s accounts.

Accounts investing in the Separately Managed Accounts – Long/Short Strategy are custodied at Interactive Brokers. Portfolio Management accounts will be charged an annual management fee of 2% of the account balance based on the value of the account on the last business day of the calendar quarter. Some accounts will pay an annual management fee of 1.50% plus a performance fee of 20% of profits charged, as further described below in Item 6. All fees are negotiable and are charged quarterly. The account value is calculated as the market value of all long and short securities positions in the account and will not be reduced by any margin or other indebtedness of the client with respect to such securities or other investments. If ACG is assessed a transactions fee, such fee will be passed on to you at cost.

All advisory contracts will specify how fees are to be billed. Generally, the annual management fee is paid in advance of service and the performance fee is paid in arrears. The initial fee payment is due in full on the date the client's account is accepted and opened by the firm and will be based on the asset value of the account on that date and prorated.

If the Client adds \$100,000 or more to (or withdrawals \$100,000 from) the Portfolio during any calendar quarter, then the Adviser will assess a fee on such amounts (or provide a rebate) in accordance with the Fee Schedule at such time and pro-rated for the partial quarter. Client will maintain or deposit sufficient funds in the account to cover payment of all fees authorized by the contract, and the firm, clearing firm, and/or custodian will debit the account balances or redeem money market fund shares in the amount equal to the fee that is due. If there are not funds to cover the fees, then ACG may liquidate assets to cover fees.

#### **GENERAL FEE INFORMATION**

Transaction charges have been negotiated with the custodian and priced in accordance with the standard accepted market practices of the financial industry. Although transaction charges may be identified as commissions on trade confirmations, the Investment Adviser Representative does not receive any portion of these charges. Transaction fees charged by the custodian may be higher or lower than transaction fees charged by other custodians.

Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory agreement. The Management Fee also does not cover fees and charges in connection with: debit balances; ADR fees, foreign stamp taxes, margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law.

Our Investment Adviser Representatives may trade on margin for client's accounts, which could result in a high portfolio turnover ratio and higher transaction charges in accounts with such charges. Additionally, the use of margin may also result in interest charges, stock loan fees as well as all other fees and expenses associated with the security or account involved.

Clients may purchase securities through broker-dealers in initial public offerings, secondary offerings and special purpose acquisition company transactions. ACG may act as a member of the selling syndicate for such offerings, and as such, will receive compensation equal to a portion of the gross spread (the difference between the price the client pays for the security and the price at which it purchased the securities). The advisory fee is not reduced to offset this compensation. The amount of the gross spread is described in the relevant prospectus, offering circular or official statement.

Although ACG believes its fees are reasonable in light of the services provided, clients should be aware that such fees may be more or less than the fees and commissions associated with investment advisory and brokerage services purchased separately. The comparison is dependent upon a number of factors, including the frequency of brokerage activity in the client's account, the size of the account under management, and any negotiated fee arrangements with respect to the account. An investor should consider these factors prior to opening an Advisory Account with ACG. Transaction fees charged may be higher than those otherwise available if the services were provided separately for a discrete fee or if an Investment Advisor were to select brokerage and negotiate commissions in the absence of the extra consulting service provided. Clients should consider the value of the additional consulting services when making such comparisons. The combination of custodial, consulting, and brokerage services may not be available separately or may require multiple accounts, documentation, and fees. All fees described herein may be subject to negotiation depending on a range of factors including, but not limited to, account size and overall range of services requested.

#### **ACCOUNT TERMINATION**

The client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be accepted the day that it is received by the contra party. Client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be accepted the day that it is received by the contra party. A termination fee may apply if the account is terminated within the first year of the advisory contract; however, a full refund will be provided without penalty if the client terminates the contract within 5 business days of signing with the firm. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or in the case of an oral contract otherwise signified their acceptance, any other provisions of this contract notwithstanding.

If you instruct ACG to terminate your advisory contract and liquidate your account, we will proceed with liquidation of your account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, you should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor. Factors that may affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. ACG and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

In order to qualify for a performance based fee arrangement, clients must have a minimum account balance of at least \$1 million or a total net worth of \$2 million.

Performance fee arrangements include an annual management fee, plus a performance fee equal up to 20% of any net profits to the account subject to a “high-water” mark. The annual management fees and performance fees are negotiable and any such accounts are managed on a discretionary basis. Performance fees are payable quarterly in arrears and based on the total account value on the last trading day of the calendar quarter. In such cases, a “high water mark” ensures that if there are any losses since the previous performance fee was paid, those losses will be recaptured before a performance fee may be charged for subsequent quarters. Net profit means all net income of the Portfolio derived from interest and dividends, plus (i) the net of realized capital gains over realized capital losses of the Portfolio, plus (iii) the net of unrealized capital appreciation over unrealized capital depreciation, minus (iv) any expenses charged to the Portfolio (including the Management Fee), computed based upon activities in the Portfolio between the first day and the last day of the applicable Measuring Period. If the agreement is executed after the beginning of a calendar quarter, then the Measuring Period will be the period between the date of the agreement and the end of the calendar quarter.

In addition to the fee charged by firm, the client will pay all ticket charges, as well as fees charged by mutual fund managers and fees for any additional services requested by the client.

Advisors managing performance based accounts while at the same time managing accounts without performance fees may constitute a conflict of interest in that a performance fee might provide incentive to the Advisor to favor that account to the disadvantage of other non-performance based accounts. In addition, the Advisor may have an incentive to trade more aggressively in order to earn a performance fee. ACG seeks to minimize potential conflicts of interest by monitoring trading activity to ensure trading activity is consistent with a clients stated investment objectives and risk tolerance.

#### **Item 7 – Types of Clients**

ACG provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates and trusts. The minimum account size is \$1,000,000. ACG has the discretion to waive the account minimum. For any third manager programs, minimums may vary by manager and such information is disclosed in each respective brochure.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

Our investment strategy begins with an understanding of a client’s financial goals. Advisors use demographic and financial information provided by the client to assess the client’s risk profile and investment objectives in determining an appropriate plan for the client’s assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds and fixed income securities.

Investment recommendations are based on an analysis of the client’s individual needs, and are drawn from research and analysis. Security analysis methods may include the following:

- **Fundamental analysis:** We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- **Technical analysis and charting:** We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a

security can change directions at any time and past performance is not a guarantee of future performance.

- **Cyclical analysis:** We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

Information for this analysis may be drawn from financial websites and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves certain risks that clients should be prepared to bear. Though the goal of the firm is to find quality investments and proper allocation strategies, there is no guarantee that the goal will be met, and/or that the value of investor portfolios may not decline in value during any given time period. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- **Short Sales:** Short selling involves the sale of the security that the account does not own and must borrow in order to make delivery in the hope of purchasing the same security at a later date at a lower price. Securities sold short are subject to unlimited risk of loss because there is no limit on the price that a security may appreciate before the short position is closed.
- **Foreign Exchange, Commodities, Options and Other Derivative Instruments:** The prices of many derivative instruments are highly volatile. The value of options and other derivatives depend primarily upon the price of the securities, indexes, commodities, currencies or other instruments underlying them. Also at risk is the failure of any of the exchanges on which its positions trade or of their clearinghouses or of counterparties.
- **Turnover:** There also could be risk related to portfolio turnover. High rates of portfolio turnover could lower performance of the portfolio through increased brokerage and other transaction costs and taxes.
- **Leverage:** Leverage involves the borrowing of funds from brokerage firms, banks and other institutions in order to be able to increase the amount of capital available for investments. Performance may be more volatile when leverage is employed.
- **Foreign Securities Risks:** This is a global strategy and as such, it may be subject to the Foreign Securities Risks identified above.
- **Expenses:** The expenses for an account in this strategy may be higher than a more traditional strategy due to some of the factors discussed in this risk section
- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- *Inflation Risk*: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

#### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of ACG or the integrity of ACG's management. ACG has no information applicable to this Item.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

Advisors of ACG are also registered representatives of Triad Advisors, a registered broker-dealer. In that capacity, they may be paid commissions, brokerage fees, 12b-1 fees or other fees or payments for their brokerage clients, which may include clients who are also clients of ACG. These arrangements pose a conflict of interest for those individuals to the extent they have a financial incentive to recommend such sales or other transactions to the client.

Clients may purchase securities through broker-dealers in initial public offerings, secondary offerings and special purpose acquisition company transactions. ACG may act as a member of the selling syndicate for such offerings, and as such, will receive compensation equal to a portion of the gross spread (the difference between the price the client pays for the security and the price at which it purchased the securities). The advisory fee is not reduced to offset this compensation. The amount of the gross spread is described in the relevant prospectus, offering circular or official statement.

Most ACG Investment Adviser Representatives are registered broker-dealer representatives of Triad Advisors. As a member of the selling syndicate ACG Advisors receive compensation from the sale of an initial public offering (IPO). Such compensation will not offset advisory fees. This may pose a conflict of interest for those individuals as they have a financial incentive to recommend IPO purchases. However, ACG and its personnel are constrained by fiduciary principles to act in the client's best interest and will only recommend IPO's when they are believed to be suitable.

Certain Advisors are separately licensed as insurance agents/brokers for various independent insurance companies. These individuals may spend as much as 5% of their time with these aforementioned non-advisory activities. In their capacities as registered representatives or as independent insurance agents,



clients will be charged separately from their advisory services. ACG clients are not obligated to purchase any recommended insurance products.

ACG requires that clients invested in the Separately Managed Account – Long/Short Strategy to establish brokerage accounts with Interactive Brokers, LLC (“Interactive Brokers”) to maintain custody of clients’ assets and to effect trades for their accounts. ACG is independently owned and operated and not affiliated with Interactive Brokers or any other broker-dealer.

Item 12 includes additional details regarding brokerage practices and related disclosures.

#### **Item 11 – Code of Ethics**

ACG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at ACG must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of ACG may buy or sell securities that are recommended to clients. ACG’s employees and persons associated with ACG are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of ACG and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for ACG’s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of ACG will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of ACG’s clients. In addition, the Code restricts trading in close proximity to client trading activity. When practical, employee trades may be aggregated with client trades. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between ACG and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with ACG’s obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. ACG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

You may request a copy of the firm’s Code of Ethics by contacting the Compliance Department at our main number.

#### **Item 12 – Brokerage Practices**

ACG requires that clients invested in the Separately Managed Account – Long/Short Strategy to establish brokerage accounts with Interactive Brokers, LLC (“Interactive Brokers”) as custodian to maintain custody of clients’ assets and to effect trades for their accounts. For ACG client accounts maintained in its custody, the custodian holding your account does not generally charge separately for custody services. They are

compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed. The custodians make products and services available to ACG that benefit ACG but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of ACG accounts. Some of these products and services provided includes software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitates trade execution and allocates aggregated trade orders for multiple client accounts; (iii) provides research, pricing and other market data; (iv) facilitates payment of ACG fees from its clients' accounts; and (v) assists with back-office functions, recordkeeping and client reporting.

Paul Bowers is not registered with a broker/dealer; however other ACG Advisors are also registered representatives of Triad Advisors, LLC and may recommend Triad for broker-dealer services. Factors for such recommendation would be when transaction compensation is seen as a benefit to the client. For broker-dealer services, ACG or its associated persons receive compensation, which is separate and distinct from compensation related to its investment advisory services. Commissions paid to ACG advisors for broker-dealer services may be higher or lower than those paid by other brokers.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist ACG in its investment decision-making process. Such research generally will be used to service all of ACG's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because ACG does not have to produce or pay for the products or services. The products received qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

You and our other clients can benefit when we aggregate trades to obtain volume discounts on execution costs. Trade aggregation refers to the practice of combining orders for execution. When consistent with our duty to obtain best execution, we will aggregate multiple client transactions into a single order in order to obtain the best price for our clients.

#### **Item 13 – Review of Accounts**

Account reviews are conducted by your Advisor at least annually. Factors that are considered during such reviews include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, monthly distributions, concentrated positions, diversification, and outside holdings. Examples of situations that may impact your account include the following: performance that is not in line with the client's "downside risk tolerance," change in investment objective, the client makes a significant addition of capital or withdrawal of capital from the account, rebalancing of the portfolio if current allocation and targeted allocation are not consistent, concentrated position that could lead to volatility, etc.

You agree to inform us in writing of any material changes to your financial circumstances that might affect the manner in which your assets should be invested. You may contact us during normal business hours to consult with your Advisor concerning the management of your account(s).

Item 15 contains information regarding the custody reports provided to you.

#### **Item 14 – Client Referrals and Other Compensation**

ACG has agreements with Lee Jenkins and Johnson Bryan to pay for client referrals. The solicitor's agreements entered into by ACG comply with rule 206(4)-3 promulgated under the Investment Advisors Act of 1940. If a client is solicited by Lee Jenkins or Johnson Bryan, ACG will pay them a portion of the management fees we collect. The details of the fee payments are detailed on the Solicitor's Disclosure which is provided to you at account opening. Solicitor's fees will be based on ACG's normal fee schedule; you will not be charged any additional fees or expenses as a result of the referral.

#### **Item 15 – Custody**

You should receive statements at least quarterly from Interactive Brokers, the qualified custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare the official custodial records to the account statements that we may provide you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### **Item 16 – Investment Discretion**

ACG receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, ACG observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to ACG in writing.

#### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, ACG does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. ACG may provide advice to clients regarding the clients' voting of proxies. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent.

#### **Item 18 – Financial Information**

Registered Investment Advisors are required to provide you with certain financial information or disclosures about ACG's financial condition. ACG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.

#### **Privacy Policy**

ACG collects non-public information about you from the following sources:

- Information we receive from you on account applications or other forms
- Information about your transactions with ACG or others
- Information we receive from a consumer-reporting agency

We do not disclose any non-public personal information about you to anyone, except as permitted by law. We maintain physical, electronic and procedural safeguards in compliance with federal standards to protect your information. If you decide to close your account(s) or you become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Investment Advisors of Atlanta Capital Group (ACG) are typically also Registered Representatives of Triad Advisors, Inc. ("Triad"). ACG will disclose customer information to and receive customer information

from Triad for the purposes of offering additional products and services to you as well as to effect, administer, service and enforce your requested transactions and maintain and service your accounts. Triad may also continue to use personal information they receive from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

ACG restricts access to your personal account information to only those employees who need to know that information to provide products or services to you. For more information on our Privacy Policy, please contact the Compliance Department at (404) 893-4100 or [compliance@atlantacapitalgroup.com](mailto:compliance@atlantacapitalgroup.com).