



Your Trusted Financial Advisor<sup>SM</sup>  
COMPASS CAPITAL CORPORATION

Tuesday, May 25, 2021

Board of Directors  
Compass Capital Corporation  
50 Braintree Hill Park, Suite 105  
Braintree, MA 02184-8734

Dear Tim,

This is our annual report for internal compliance regarding the **CCC Identity Theft Prevention Program (ITPP) under the FTC FACT Act Red Flags Rule** for the FYE 6/30/21.

Our identity theft policies, procedures and internal controls under our ITPP have been reviewed and updated periodically to ensure they account for changes both in regulations and in our business.

As required by *Rule: 16 C.F.R. § 681.1, Appendix A, Section VI.(b).*, this report address the effectiveness of our ITPP in addressing the risk of identity theft in connection with covered account openings, existing accounts, service provider arrangements, significant incidents involving identity theft and management's response and recommendations for material changes to our ITPP. Given that CCC has not had any material changes to our operations, structure, business or location or to those of our clearing firm, nor has it experienced any identity theft issues at all, we find the program to be adequate as drafted at this time.

None the less our firm will also follow new ways that identities can be compromised and evaluate the risk they pose for our firm

Sincerely,

Timothy Shanahan  
President  
Compass Capital Corporation