

## CUSTOMER PRIVACY NOTICE

Advisor is committed to safeguarding the confidential information of its clients. Advisor holds all personal information provided by clients in the strictest confidence. Advisor's IAR's may also be registered representatives of SAI, a registered broker/dealer that is not affiliated with Advisor. Advisor may also have relationships with other non-affiliated investment advisors, such as Securities America Advisors, Inc. (SAA), an affiliate of SAI, insurance companies, trust companies, custodians, such as Charles Schwab & Company, Inc., and other financial institution entities. Except as required or permitted by law, Advisor does not share confidential information about clients with non-affiliated third parties. In the unlikely event, there were to be a change in this fundamental policy that would permit additional disclosures of confidential client information, Advisor will provide written notice to its clients, and they will be given an opportunity to direct Advisor as to whether such disclosure is permissible.

### AN IMPORTANT NOTICE CONCERNING CUSTOMER PRIVACY

**Customer Information the Advisor Collects.** Advisor collects and develops personal information about Clients, and some of that information is non-public personal information (Customer Information). The essential purpose for collecting Customer Information is to provide and service the financial products and services clients obtain from Advisor. The categories of Customer Information collected by Advisor depends upon the scope of the engagement with the client and are generally described below. As an investment advisor, Advisor collects and develops Customer Information about clients in order to provide investment advisory services. Customer Information Advisor collects includes:

- Information received from clients on financial inventories through consultations. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account and other records concerning Clients' financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about a client's financial products and services transactions with the Advisor.

**Data Security.** Advisor restricts access to Customer Information to those associated persons and employees who need the information to perform their job responsibilities. Advisor maintains agreements, as well as physical, electronic and procedural securities measures that comply with federal regulations to safeguard Customer Information about clients.

**Use and Disclosure of Customer Information to Provide Customer Service for Accounts.** To administer, manage and service customer accounts, process transactions and provide related services for Client accounts, it is necessary for Advisor to provide access to Customer Information within the firm and to non-affiliated companies such as SAI, SAA, other investment advisors, other broker/dealers, trust companies, custodians and insurance companies. Advisor may also provide Customer Information outside of the firm as permitted by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

**Former Clients.** When clients close an account with Advisor, it will continue to operate in accordance with the principles stated in the Notice.

**Requirements of Federal Law.** In November of 1999, Congress enacted the *Gramm-Leach-Bliley Act* (GLBA). The GLBA requires certain financial institutions, including broker/dealers and investment advisers, to protect the privacy of Customer Information. To the extent a financial institution discloses Customer Information to non-affiliated third parties, other than as permitted or required by law, customers must be given the opportunity and means to opt out (or prevent) such disclosure. Please note that that the Advisor does not disclose Customer Information to non-affiliated