

**Item 1 Cover Page**

**ADG Wealth Management Group, RIA**

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This brochure provides information about the qualifications and business practices of ADG Wealth Management Group, RIA. If you have any questions about the contents of this brochure, please contact us at (504) 267-9880. 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.

Additional information about ADG Wealth Management Group, RIA also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

\*The designation of RIA, Registered Investment Advisor, does not imply a certain level of skill or training.

## **Item 2 Material Changes**

This Brochure dated March 29, 2018 serves as a replacement to all previous Brochures. Material Changes to this Brochure since our last annual update is as follows:

We eliminated sections of Item 4 that duplicated the discussion in Item 8.

We have revised and streamlined our discussion of fees in Item 5.

We have updated our discussion of broker selection and evaluation in Item 12.

We have updated our discussion of account review in Item 13.

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#### **Item 4 Advisory Business**

As an active money manager, ADG Wealth Management Group, RIA herein further referred to as “Advisor”, uses technical and fundamental indicators in determining the strength and value of the market. Advisor then repositions the client’s accounts into areas that the Advisor expects to be the strongest going forward. Advisor can also reposition a client’s assets to cash as a defensive strategy. Advisor also provides to clients advice on life insurance, health insurance, long-term care insurance and disability insurance. Advisor also offers financial planning services to clients. This includes, but is not limited to: advice on estate tax, income tax, retirement or business planning. Financial Planning information will be obtained through personal interviews with clients concerning their current financial status, future goals and attitudes towards risks. Clients are under no obligation to act on our recommendation. If they elect to act on any or all of the recommendations, they are under no obligation to effect the transactions through the Advisor.

Advisor sells securities and acts as a registered representative for advisory clients. Clients are not required to use the facilities of Advisor for the purchase of any investment/financial products. If they do so, Advisor makes full disclosure to them of any applicable fees or commissions that apply to the investment/financial product. Clients are free to implement advisory recommendations through any firm. There is no obligation to do transactions through Triad Advisors, LLC.

As of 12/31/2017, the advisor managed a total of \$224,073,947 of which were \$179,034,927 are discretionary accounts and \$45,039,020 are non-discretionary accounts under management.

Advisor’s security analysis includes charting, fundamental and technical methods. Economic and market data is compiled and reviewed on a weekly basis. Advisor uses moving averages to monitor the performance of investments. Analysis focuses on historical data regarding past performance of funds and/or partnership sponsors as well as expectations regarding future performance. A changing buy or sell signal produced by moving averages would trigger a review of a client’s portfolio. Investment strategies used to implement any investment advice given to clients include long-term purchases and/or short-term purchases. Investing in securities involves risk of loss that clients should be prepared to bear.

Investment in any asset class comes with inherent risks and uncertainties that could result in loss of value. The value of fixed income securities and equity securities are impacted by the expected risks and returns of other asset classes, including money markets, CDs and each other. Risk factors for fixed income securities include, but are not limited to, credit risk, interest rate risk, and liquidity risk. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. Equity and fixed income securities are also issued and traded around the world offering global diversification but a near infinite number of investment options as well. Equity securities are also grouped relative to market capitalization and style, growth versus value. Due to these complexities, Advisor utilizes various third party research to help determine asset allocation and to assist with security and manager selection. In certain cases, Advisor recommends that client engage third party money managers, such as Ladenburg Thalmann or CLS Investments to manage client accounts.

## **Item 5 Fees and Compensation**

All fees charged for advisory services should be calculated and charged in accordance with the terms of the client signed investment advisory agreement or financial planning agreement.

The Advisor typically charges clients directly for active money management services. Management fees are negotiable but will not exceed 2% per year. The client will also be responsible for transaction costs associated with the purchase of mutual funds, exchange traded funds, stocks, and bonds. Other client fees will vary by custodian but may include IRA maintenance fees of \$40 per year, inactivity fees of \$50 per year, and annuity subscription fees of \$20 per month.

For accounts held at Fidelity and TD Ameritrade, client fees are billed in arrears, either quarterly or semi-annually. The fee is based on the account balance at the end of the billing period. Account balances used for billing may or may not equal the statement balance due to a variety of factors, primarily related to dividends and interest earned but not yet received. Client fees are typically directly deducted from client accounts. Clients also have the option to pay the fee directly or to request the fee be deducted from an alternate account.

For accounts held at National Financial Services via Triad Advisors, client fees are billed in advance, typically on a quarterly basis. The fee is based on the average daily balance of the account during the billing period. Client fees are typically deducted from client accounts. Clients also have the option to pay the fee directly or to request the fee be deducted from an alternate account.

For fee-based annuity accounts held at Jefferson National, client fees are billed in arrears on a quarterly basis. The fee is based on the account balance at the end of the billing period. Account balances used for billing may or may not equal the statement balance due to a variety of factors, primarily related to dividends and interest earned but not yet received. Client fees are typically deducted from client accounts. Clients also have the option to pay the fee directly or to request the fee be deducted from an alternate account.

In limited circumstances, advisory fees may be paid indirectly via a 1% trail commission on "C" share mutual funds. The trail fee is credited against the advisory fee and no additional direct management fees will be charged to the accounts. These situations generally relate to shares held directly with mutual fund companies, such as Amundi Pioneer Investments.

Advisor may be paid a fixed fee for general financial planning advice. These fees are detailed in the financial planning agreement signed by the client. Advisor may directly and indirectly receive compensation through Triad Advisors, LLC. from a number of affiliated and unaffiliated sources. If an advisory client implements recommendations made by the Advisor by purchasing investments through him, he may receive additional compensation in the form of trail commissions. Triad Advisors continues to take steps to minimize this conflict of interest. Advisor engages or is engaged by Wealth Harbor Capital Group as a sub-advisor.

The advisory agreement may be terminated at any time by notice in writing by either party. Termination shall be effective when received by all parties to said Agreement or ten (10) business days from the date of termination notice, whichever occurs sooner, or if a later termination date is specified in the notice, on that specified date. Advisor will not accept any termination instructions,

including account liquidation instructions, unless provided in writing by the Client. Client may also be responsible for termination fees and account transfer fees charged by the custodian. Fees paid in advance hereunder will be prorated to the date of termination, and any unearned portion thereof will be refunded to Client. No assignment, as the term is defined in the Investment Advisors Act of 1940, of the Agreement shall be made by Advisor without written consent of Client.

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

Advisor does not charge Performance-Based Fees or Side-By-Side Management.

### **Item 7 Types of Clients**

Advisor generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, foundations, corporations, or business entities.

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

As an active money manager, Advisor's security analysis includes charting, fundamental and technical methods. Economic and market data is compiled and reviewed on a weekly basis. Advisor uses moving averages to monitor the performance of investments. Analysis focuses on historical data regarding past performance of funds and/or partnership sponsors as well as expectations regarding future performance. A changing buy or sell signal produced by moving averages would trigger a review of a client's portfolio. Investment strategies used to implement any investment advice given to clients include long-term purchases and/or short-term purchases. Investing in securities involves risk of loss that clients should be prepared to bear.

Advisor's **Bond Rotation Model** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Subaccounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments, including but not limited to U.S. treasury bonds, municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. A client's account can be positioned, in whole or in part, to any of the aforementioned fixed income positions. Allocations will be determined by a combination of technical and fundamental analysis. Advisor can utilize the Cash/Money market position in a down market in order to minimize the loss to a client. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities.

Advisor's **Fixed Income Model (Municipal Bonds)** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments whose interest is generally exempt from federal income taxes. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

The Advisor's **Fixed Income Model (Qualified)** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments, including but not limited to U.S. treasury bonds, taxable municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

The Advisor's **Fixed Income Model (Non-Qualified)** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments including, but not limited to, U.S. treasury bonds, municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

The Advisor's **Strategic Advisory Model** is comprised of various positions. The portfolio may consist of a combination of Equities, Fixed Income Securities, Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, the Cash/Money Market position, and/or Alternative Investments. The portfolio may also include positions the Client acquired/held prior to his/her relationship with Advisor, though the Client seeks ongoing investment advice relative to those positions. Client and Advisor mutually agree that it is beneficial to both Client and Advisor to enter into the Agreement. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal),

interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities.

The Advisor's **Strategic Income Model** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Subaccounts, and the Cash/Money Market position. This model may invest in both equity and fixed income securities. The equity investments may include, but are not limited to, dividend paying stocks, master limited partnerships, real estate investment trusts, preferred stocks, and business development companies. The fixed income investments may include, but are not limited to, U.S. treasury bonds, municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities.

The Advisor's **Equity Rotation Model** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Subaccounts, and the Cash/Money Market position. There is the U.S. equity position, the international equity position, the emerging/frontier market position, and the cash/money market position. Based on signals produced by moving averages, a client's account can be positioned in 1 to 4 of the positions. The maximum allocation for U.S. equities and cash/money market is 100%, for international equities is 75%, and for emerging/frontier equities is 50%. The specific investments utilized may include a combination of Mutual Funds, Exchange Traded Funds, and Closed End Funds. The Advisor can utilize the Cash/Money Market position in a down market in order to minimize the loss to a client. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate

risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

Investment in any asset class comes with inherent risks and uncertainties that could result in loss of value. The value of fixed income securities and equity securities are impacted by the expected risks and returns of other asset classes, including money markets, CDs and each other. Risk factors for fixed income securities include, but are not limited to, credit risk, interest rate risk, and liquidity risk. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. Equity and fixed income securities are also issued and traded around the world offering global diversification but a near infinite number of investment options as well. Equity securities are also grouped relative to market capitalization and style, growth versus value. Due to these complexities, Advisor utilizes various third party research to help determine asset allocation and to assist with security and manager selection.

In certain cases, we recommend the client engage third party money managers such as Ladenburg Thalmann or CLS Investments to manage client accounts. In those instances, we pay a portion of the client's advisory fee to the third party manager or the client pays the third party manager directly and we receive a solicitation fee.

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

There is no pending or historical criminal or civil action in a domestic, foreign or military court of competent jurisdiction involving Advisor or a management member of Advisor. There is no pending or historical administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority involving Advisor or a management member of Advisor. There is no pending or historical self-regulatory organization (SRO) proceeding involving Advisor or a management member of Advisor.

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

Investment advisor representatives are representatives of Triad Advisors, LLC., a registered broker/dealer and member of FINRA/SIPC, based in Atlanta, Georgia. Triad Advisors, LLC. is also registered as an investment advisor. Advisor is a sub-advisor to Wealth Harbor Capital Group, who is registered as an investment advisor with the SEC.

#### **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

ADG Wealth Management Group, LLC, as Advisor, requires all client interests to come before Advisor's interest. Advisor representative(s) or management person(s) may choose to invest in the same model(s) and/or model portfolio(s) that are recommended to clients. As this situation could present a conflict of interest, we have established the following guidelines to ensure our fiduciary responsibilities: A. "Advisor" follows a "Last In/Last Out" practice when trading in these situations. B. All client purchase/sell orders are placed first. C. After all client purchase/sell orders

are placed, any purchase/sell orders for Advisor representative(s) or management person(s) may be placed. While this does not ensure that client will receive a more favorable price, we do believe prioritizing the client trades is a prudent way to manage this potential conflict of interest. These guidelines only apply to situations when the client and the investment advisor representative or management person is invested in the same model. There will be other situations where the goals, objectives, risk tolerance, and time horizon of the client differs from that of the investment advisor representative or management person. In these situations, the investment advisor representative or management person must use his professional judgment to determine what securities to buy and sell and when to buy and sell those securities.

All client material information is considered confidential and protected as such. Records and detailed client background information is secure both in hard copies and via electronic storage methods. All administrative support personnel are fully aware of client protection procedures; and fully comply with all policies and procedures designed to insure confidentiality. A copy of Advisor's detailed code of ethics is available upon request.

### **Item 12 Brokerage Practices**

With regard to our advisory clients, we may recommend affiliated or unaffiliated broker-dealers with which clients may establish accounts (custodians) to be managed by the Firm. In recommending these broker-dealers, the Firm takes into account the range and quality of services provided by the broker-dealer to the client and to the Firm in its capacity as discretionary investment manager for the client's account, including, but not limited to, the broker-dealer's computer software and support systems that enable the Firm to access online account information, generate account statements and reports and place orders to buy or sell securities for the account.

Advisor currently recommends the following custodians: 1. National Financial Services/Fidelity Investments for Mutual Funds, ETFs and government securities. 2. Jefferson National Life Insurance for variable annuity contracts. 3. TD Ameritrade for mutual funds, ETFs and government securities. 4. Amundi Pioneer Investments for mutual funds. Advisor is not affiliated with nor compensated by any of the above custodians/investment firms.

Clients may use their own custodian. These directions shall be in writing.

The Firm generally will direct transactions in securities for the account of a client to the broker-dealer firm that the client has selected as its broker-dealer and account custodian, provided that the Firm reasonably believes that such broker-dealer will provide best execution for such transactions.

Advisor is a registered investment adviser. In addition, the principals of the Adviser are registered representatives of Triad Advisors, LLC., a registered broker/dealer and member of FINRA/SIPC, based in Atlanta, Georgia. Clients are not required to use Triad Advisors, LLC. for the purchase of any investment/financial products. If they do so, Advisor makes full disclosure to them of any applicable fees or commissions that apply to the investment/financial products. Clients are free to implement advisory recommendations through any firm. There is no obligation to do transactions through Triad Advisors, LLC.

Advisor believes these firms referenced above provide very reasonable and in some cases, exceptionally low cost for all client investment needs. All fees are fully disclosed and are available to clients either in writing or in electronic form via the internet from the custodian's website.

### **Item 13 Review of Accounts**

Advisor monitors accounts on, at minimum, a monthly basis. Advisor does so in conjunction with carrying out the investment analysis and implementation of each model. The client has full access via the custodian's website through which they can monitor every detail of their personal accounts. Clients are advised to notify the Advisor of any change in circumstance which would potentially affect a change in investment objectives. Such notification would begin a process encompassing a client meeting and discussion to clarify the clients' position and determine any changes in investments or models which seems appropriate.

In addition, our principals review accounts with clients. Meetings are scheduled with clients either in person or over the phone no less than annually to discuss accounts. At that time, discussions are held regarding any changes clients wish to implement or concerns they may have. The review may include analysis and discussion of statements provided by the custodian. Financial Plans are updated as frequently as the client deems necessary.

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

Advisor does not compensate third parties for client referrals. Advisor does receive compensation from third party money managers for our role as solicitor. Advisor may directly and indirectly receive compensation through Triad Advisors, LLC. from a number of affiliated and unaffiliated sources. If an advisory client implements recommendations made by the Advisor by purchasing investments through Advisor, Advisor may receive additional compensation in the form of commissions. In certain cases, we recommend the client engage third party money managers such as Ladenburg Thalmann or CLS Investments to manage client accounts. In those instances, we pay a portion of the client's advisory fee to the third party manager or the client pays the third party manager directly and we receive a solicitation fee.

Advisor may directly or indirectly receive compensation from Wealth Harbor Capital Group for its role as sub-advisor.

### **Item 15 Custody**

Clients will receive account statements from the custodians, including mutual fund companies, variable annuity companies, Triad Advisors, LLC or other qualified custodians on a minimum of a quarterly basis. Clients should review those statements carefully. We are deemed to have custody of certain accounts by the SEC whereby we have authority to make transfers from those client accounts. In those instances, we follow SEC regulations and guidance on required documentation and procedures to make those transfers.

### **Item 16 Investment Discretion**

A signed Asset Management Agreement is in place for each advisory account. In this agreement, a client grants discretion to Advisor regarding the trading of shares of mutual funds of the same

family or variable annuity sub accounts or exchange traded funds based on changing market conditions. For those client accounts where Advisor will have investment discretion, the client has given the Advisor written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides Advisor discretionary authority via a discretionary investment management clause in the Investment Advisory contract and/or a limited power of attorney clause in the contract between the client and the custodian.

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

Advisor does not have the authority to vote client securities. Clients will receive their proxies or other solicitations directly from the custodian or transfer agent. The client may contact Advisor by phone with questions regarding a particular solicitation they received.

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

Advisor does not require or solicit prepayment of more than \$1,200 in fees per client, six (6) months or more in advance. Advisor has not been the subject of a bankruptcy petition at any time during the past ten years.

#### **Item 19 Requirements for State-Registered Advisors**

This section does not apply to investment advisors registered with the SEC.

## **Item 20 ADG Privacy Policy**

### **Privacy Policy**

ADG Wealth Management Group, L.L.C. and its affiliated companies are concerned about your privacy and are committed to maintaining the trust and confidence of our customers. In order for us to provide you with high quality products and services, we must collect personal information about you. We believe you should know about the information we collect, the safeguards we have in place to protect it, and the situations in which we might share information with select business partners. The following describes our Privacy Policy. Please review this information and feel free to contact us with any questions.

The kinds of non-public personal information we collect about you:

- Information from you on account applications and other forms, such as name, address, social security numbers, assets, types and amounts of investments, transactions and income;
- Information about your transactions with us, our affiliates, or with others, such as account activity, payment history, and products and services purchased;
- Information received from consumer reporting agencies, such as credit relationship and credit history;
- Information from other individuals, businesses and agencies, such as demographic, and/or medical information.

Information that we may disclose to non-affiliated third parties:

- Advisors of ADG Wealth Management Group, LLC may also serve as registered representatives of Triad Advisors, LLC., a registered broker/dealer. Information may be shared with that broker/dealer to assist in meeting its regulatory oversight obligations.
- We do not sell or disclose your non-public personal information to non-affiliated marketing companies;
- We may disclose all of the information we collect, as described above, to companies that perform marketing or other services on our behalf, or to other financial institutions with whom we have joint marketing agreements. All of these companies are contractually obligated to keep the information that we provide to them confidential and use the information only for the services required and as allowed by applicable law or regulation, and are not permitted to share or use the information for any other purpose;
- We may disclose information about you to third parties, when it is necessary, in order to effect, administer, or enforce a transactions that you request or authorize, or to conduct our operations on your behalf;

- We may be required by law or regulation to disclose information to third parties. Examples include, in response to a subpoena, to prevent fraud, or to comply with rules of, or inquiries from, industry regulators.

Safeguards to protect the confidentiality and security of your non-public information: We have implemented physical, electronic, and procedural safeguards to ensure that access to customer information is limited to employees, registered representatives and agents who may need access to it to do their jobs. They are required to respect the confidentiality of all customer information. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change this policy at any time and you will be notified if any changes occur.