

Identity Theft Prevention/Red Flag Policy

Policy Objectives

The purpose of the LPL Financial Identity Theft Prevention/Red Flag Policy is to define LPL Financial business units' responsibilities in detecting, preventing, and mitigating identity theft as required by the Federal Trade Commission (FTC) under the Fair and Accurate Credit Transactions (FACT) Act. The rule adopted by the FTC is referred to as the "Red Flag Rule".

Policy Scope

All employees, temporary workers and contractors of LPL Financial and its affiliates are responsible for adhering to this policy.

Policy Owner

The LPL Financial Identity Theft Prevention Officer is responsible for administering this policy.

Responsibilities

LPL Financial takes seriously its regulatory responsibilities and all reports of identity theft will be investigated and acted upon, up to and including the involvement of law enforcement agencies when needed.

All employees are required to receive regular training on identity theft prevention. This training includes but is not limited to the new hire training process.

Business units are responsible for maintaining procedures to identify red flags and monitor accounts that have been flagged as being potentially linked to instances of identity theft. Department management is responsible for performing regular identity theft risk assessments and updating related procedures, as necessary.

Examples of ID Theft Prevention Procedures:

1. Obtaining identifying documents from new customers
2. Verifying information received from consumer reporting agencies and service providers
3. Authenticating customers through the use of passwords and security personal identification Numbers(PINs).
4. Monitoring account transactions
5. Verifying the validity of address changes

The Board of Directors assigns specific responsibility for implementation of the Identity Theft Prevention Policy, approving material changes. The Identity Theft Prevention Officer reports no less frequently than annually on status to LPL Financials Board of Directors.

Reporting Procedure

If you are a client of LPL Financial and feel you may be a victim of identity theft please contact your financial advisor.

Any suspicion of, or incidents of Identify Theft discovered must be promptly reported to LPL Financial via the Security Incident Hotline at (866) 578-7011.