



DEMPSEY LORD SMITH, LLC

MEMBER FINRA/SIPC

Privacy Policy September 2019

Protecting Your Privacy and Security

At Dempsey Lord Smith, LLC, your privacy is our priority.

We collect personal information to open your account(s), to process your transactions and to help us provide a better level of service. We do not sell your personal information to anyone. We protect the security and confidentiality of the personal information we collect.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust. The following are details of our approach to privacy.

The Dempsey Lord Smith, LLC Privacy Policy

The Dempsey Lord Smith, LLC Privacy Policy applies to consumers who are current or former clients. Throughout the policy, we refer to information that personally identifies you or your account(s) as “personal information”.

We do not sell your personal information to anyone.

We do not disclose personal information to third parties, unless one of the following limited exceptions applies:

- We disclose personal information, such as account and transaction data, to companies, including financial institutions that contract with us to manage portfolios, execute transactions, or act in a custodial capacity, etc. We have contracts with these companies that prohibit them from using your personal information for their own purposes.
- We may disclose personal information to companies that help us process or service your transactions of account(s), including companies that print and mail you account statements.
- We may disclose or report personal information, in limited circumstances, namely when a good faith disclosure is required by law. (For example: to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, or for institutional risk control).

Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

We do collect personal information in the normal course of business in order to administer your account(s) and serve you better.

- Application and registration information: We collect information that you provide to us when you open an account, make application to or through Dempsey Lord Smith, LLC for the purchase

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901 N Broad Street, Suite 400, Rome Georgia 30161
706-238-9575

of a securities product or service, or register for one or more of our services such as financial analysis or seminars. The information we collect may include name, address, phone number, e-mail address, Social Security Number, financial information, and information about your investment desires and experience. We also may collect information from consumer reporting agencies.

- **Transaction Information:** Once you have an account with us, to administer your account and better serve you, we collect and maintain personal information about your transaction. Information we collect includes balances, positions, and history, and may include your name or other data in an internal client list reflective of your activities at Dempsey Lord Smith, LLC, and with outside contracted providers.

We use your personal information to fulfill our regulatory obligation and to help us deliver the best possible service to you.

- Dempsey Lord Smith, LLC is required by its various regulatory authorities such as the U.S. Securities Exchange Commission (SEC), Financial Industry Regulatory Authority (FINRA), and state jurisdictions to collect, review, and maintain certain personal information (such as investment history, financial data, employment history, etc.) in order to fulfill various regulatory requirements.

We protect the confidentiality and security of your personal information.

- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.
- We restrict access to personal information to select employees and agents who have a need for such information for business purposes only. All such employees are trained and required to safeguard such information.
- We maintain physical, electronic, and procedural safeguards to guard your personal information.

We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up-to-date.

- If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records and better serve you.

We will provide notice of changes in our information-sharing practices.

- If at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

If you have any questions or concerns, please contact us by email at service@dempseyi.com, or call us at (706) 238-9575.

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**Business Continuity Plan Disclosure Statement
September 2019**

Dempsey Lord Smith, LLC (DLS) is a fully-disclosed introducing broker/dealer who clears, executes and settles its trades through our clearing firm National Financial Services, LLC, (NFS). In connection with these services, DLS is required to communicate its position on our business continuity practices.

DLS is committed to serving its clients with continual quality support and care. As such, we have developed a business continuity plan that will help reduce or eliminate the impact of potential business disruptions.

Our plan focuses on three primary events: physical disasters (such as fire, severe weather etc.), events impacting stock and bond market operation, and cyber events. The main objectives of the plan are to meet the needs of our customers, uphold the safety of our employees, and cover our regulatory obligations while mitigating the impact of events. Key procedures include back-up of critical data systems, and alternative office locations. The plans are reviewed and tested to insure they are effective should an actual event occur.

In addition, our clearing firm, National Financial Services, LLC, has its own business continuity plan that addresses possible disruptions, and includes strategies such as alternate physical locations of business, alternative means of communication with clients, and backup telecommunications and systems. They review and test these plans on an annual basis to ensure clients will have access to funds and securities with minimal delays.

Contact Information

In the event of a disruption of business operations you contact our firm through one of the following channels:

- By Telephone 706.238.9575
- By Fax 706.238.9578
- By Email service@dempseyi.com
- Online www.dempseylordsmith.com
- In Person 901 N Broad Street, Suite 400, Rome Georgia

Dempsey Lord Smith, LLC's full Business Continuity Plan can be obtained by request by mail:

Dempsey Lord Smith, LLC
C/O Business Continuity Plan
901 N Broad Street, Suite 400
Rome, GA 30161

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SIPC Disclosure

Dempsey Lord Smith, LLC is a member of Securities Investor Protection Corporation (SIPC). To learn more about SIPC or to request a brochure, please visit www.sipc.org or call 1-202-371-8300.

How do I communicate with the Firm?

Should you need to contact Dempsey Lord Smith, LLC home office regarding any matter associated with your account(s) or a complaint please use one of the following methods:

Mail: Compliance Department
901 N Broad Street
Suite 400
Rome, Georgia 30161

Fax: 706.238.9578

Email: service@dempseyi.com

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