

IMPORTANT PRIVACY INFORMATION

Preserving the trust you place in us with your personal information is the cornerstone of our relationship with you. That's why we recognize that you expect us to protect the information you provide us and to use it responsibly. For that reason we adhere to the following policy regarding the privacy of your personal information.

INFORMATION WE COLLECT

We collect nonpublic personal financial information about you from some or all of the following sources:

- Information we receive from you on account applications, investment-related questionnaires, and product applications. The information we collect may include your name, address, phone number, email address, Social Security number, and information about your investment history;
- Your transactions with us, our affiliates, and those product sponsors with whom we have sales agreements or other arrangements for the provision of services to you;
- Consumer reporting agencies; and
- Affiliated and unaffiliated product sponsors with whom we have contractual arrangements and whose products you own.

INFORMATION WE DISCLOSE

We do not sell your nonpublic personal information to anyone. We will not share nonpublic personal information concerning our customers or former customers for marketing purposes, except as permitted by law, as described herein. We will not share nonpublic personal information concerning our current or former customers with affiliated or unaffiliated third parties, except as permitted by law. To the extent permitted by law, we may disclose to either affiliated or unaffiliated third parties, any of the nonpublic personal information that we collect. Generally, we disclose customer nonpublic personal information to affiliates and unaffiliated third parties that provide services to us to enable us to more effectively and efficiently service your account. We also disclose your nonpublic personal information to affiliated or unaffiliated third parties with whom we have contractual relationships that allow us to provide the products or services that you have requested through us. Examples of third parties with whom we may share your nonpublic personal information include:

- Mutual fund companies, insurance companies, and other product vendors to effect your purchases and sales, and allow for the servicing of your account;
- The broker/dealer through whom we execute your securities transactions;
- Clearing agencies through whom we clear and settle securities transactions;
- Third party investment advisory firms with whom we have relationships for the management of customer advisory accounts;
- Companies providing reporting services for your account;
- Companies that assist us with the maintenance of required regulatory books and records; and
- Regulators and law enforcement authorities when we believe in good faith that disclosure is required or permitted under law.

Where we share your nonpublic personal information with third parties for the purposes noted above, we ensure that there are contractual restrictions or other legal restrictions on their use and disclosure of that information.

STEPS WE TAKE TO PROTECT YOUR INFORMATION

We have security practices and procedures in place to prevent unauthorized use or access to your nonpublic personal information. Internally, your information is only available to those employees requiring access to process or service your transactions with us, and those fulfilling compliance, legal or audit functions on our behalf. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of your information in accordance with state and federal privacy regulations.

CHANGES IN THE POLICY

Should we change this Privacy Policy we will provide advance notice of such changes to you. Should we find it necessary in the future to disclose any of your personal information in a manner that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure.