



## Privacy Policy Notice

### 1. General Information

**This notice is provided to you in compliance with the Financial Services Modernization Act (Gramm-Leach-Bliley Act) of 1999, for information purposes only. No action is required on your part.**

The Act regulates how financial services companies, including advisors, may collect, use and maintain non-public personal information ("personal information") and under what circumstances we may share your personal information with other parties. Non-public personal information is any information that cannot be found in public sources including government records, widely distributed media (such as telephone directories or newspapers) or information disclosed to the public as required by law.

### 2. Disclosure Statement

In order to advise you and to open, close, transfer, modify, administer, service, and manage your accounts and policies and to conduct our business, we collect, disclose and protect personal information of consumers, customers and clients.

### 3. Personal Information We May Collect and Disclose

In the course of inquiring, considering, or doing business with us, you share personal information. Whether you are a prospective, current or previous client, customer, or consumer, we respect your privacy. We collect personal information about you from applications, forms, statements, documents, policies, meetings, teleconferences, web conferences, websites, seminars, promotional offers, correspondence, other communications and your transactions. You may provide personal information in writing, electronically, or by phone, fax, mail, e-mail, or verbally, in person or through your representative. We may collect and use information from outside sources as part of our marketing and service efforts.

Personal information includes your name, address, e-mail address, phone numbers, fax number, date of birth, social security number, financial account numbers, passwords, balances, holdings and activity, sources and amounts of income, assets and liabilities, investments, goals, risk tolerance, investing experience, insurance coverage and needs, medical history, annuities, beneficiaries, family information, tax information, business information, information obtained from visitors to our web site, credit card numbers, frequent flyer account numbers, and other information that you provide us directly or indirectly through representatives, agents, advisors, solicitors, marketers or service providers. We may keep and use your information as long as needed.

### 4. Parties to Whom We May Disclose Personal Information

You authorize us to disclose the personal information needed to advise you and to open, close, transfer, modify, administer, service, and manage your prospective, current or past accounts and policies and for us to conduct our business. We may disclose some or all of this information to our employees, agents, successors and affiliates, as well as third party service providers (such as broker-dealers, registered representatives, custodians, banks, sub-advisors, insurance and annuity companies and agents, insurance health examination providers, and other service providers, depending on your specific financial situation, such as other advisors, agents, consultants, investment advisors, managers, brokers, lenders, lawyers, accountants and estate administrators) that assist us in providing advice, information, servicing your accounts or processing fees, charges or transactions for your accounts, for processing frequent flyer accounts, to government agencies, examiners or law enforcement, to parties being used for resolving disputes, to joint account holders and trustees, to parties that provide administrative, recordkeeping, payment processing, order fulfillment or marketing services on our behalf, to other financial institutions with whom we have joint marketing agreements, to other parties when authorized by you, and as otherwise permitted or required by law. You authorize us to disclose your name or your company's name as a client of our firm and on our client list. Otherwise, we may not disclose your personal information except as permitted or required by law. Any medical information may be disclosed for insurance purposes only. Illegal and suspicious activity is reported as required by law.

### 5. Your Opt Out Rights

If you prefer that we not disclose confidential personal information about you to non-affiliated third parties, you may opt out of the disclosure: that is, you may direct us not to make those disclosures (other than disclosures permitted or required by law). If you wish to opt out of disclosures to nonaffiliated third parties you may notify us by mail, e-mail or fax of the specific personal information that we may not disclose. Please refer to the Act and its associated regulations for more information.

### 6. Protecting Your Personal Information

We do not sell personal information about you to anyone. Access to your personal information is restricted to those companies, agencies, employees, representatives and individuals that provide information gathering or storage services or have a need to know that information to provide products or services for you. We maintain physical, electronic and procedural safeguards to protect your personal information. We may keep personal information or backup copies at offsite storage locations or computer storage systems. We require our service providers to restrict access to your personal information and to maintain physical, electronic and procedural safeguards to protect your personal information. However, we are not responsible for the acts or omissions of others. You also understand that information exchanged by email, fax, wireless device or Internet is not secure and we are not responsible for any interception, theft or misuse of information transmitted electronically. Online transactions we place for you use Secure Socket Layer (SSL) technology and 128-bit encryption for protection.

### 7. Making Sure Your Personal Information is Accurate

The accuracy of your personal information is important to us. Please let us know about any changes or outdated, incomplete or inaccurate information so that we may update your information in our records.

### 8. Annual Delivery, Receipt and Acceptance

- a) By establishing, considering, renewing or maintaining an account or relationship with us, or initiating the purchase of a product or service, you acknowledge receipt of this notice on or before the date you established an account or relationship with us or initiated the purchase.
- b) You agree to the terms of this notice unless you have notified us otherwise in writing. We may revise the terms of this notice from time to time.
- c) You understand that you may receive a copy of the current revision of this notice each year or upon your request.
- d) **You understand that you may view a copy of the current revision of this notice on our website ([www.AdvisorFinancialServices.com](http://www.AdvisorFinancialServices.com)) at any time.**

We value your business and the trust you have placed in us.  
Please contact us if you have any questions or concerns  
regarding our privacy policy.

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