

PRIVACY POLICY
Shareholders Service Group (“SSG”) Privacy Policy

Title V of the Gramm-Leach-Bliley Act of 1999 required the Securities and Exchange Commission (“SEC”) to adopt rules relating to the privacy of nonpublic personal information of consumers and customers. As a result, the SEC adopted Regulation S-P, “Privacy of Consumer Financial Information.”

Accordingly, SSG developed a privacy policy that addresses safeguards for the protection of its customer records and information.

Shareholders Service Group’s Privacy Policy states the following:

“Customer Information” means information identifiable with a specific customer. This policy is provided to you in accordance with the Federal Financial Privacy Laws, 15 U.S.C. 6801-6810.

Protecting Your Information

Shareholders Service Group DOES NOT SELL ITS CUSTOMER INFORMATION TO ANYONE. WE WILL ONLY SHARE CUSTOMER INFORMATION WITH OTHERS AS STATED IN THIS POLICY, UNLESS WE PROVIDE ADDITIONAL NOTICE OR ASK FOR YOUR PERMISSION.

We value your trust and carefully handle any information we possess about you. All SSG associates who have access to your information are required to treat Customer Information confidentially, and they are subject to disciplinary action if they fail to follow this requirement. We destroy documents that may contain customer information before discarding.

Information We Collect

SSG collects and uses various types of information to service your accounts. The Customer Information we collect and store generally consists of the following:

1. Information gathered from applications, forms and other information you provide us, whether in writing, in person, by telephone, through your advisor, electronically or by any other means, such as your name, address, social security number, assets, income, and debt.
2. Information about your transactions and your account experience with SSG, such as your account balances, trading activity, payment history and parties to transactions.
3. Information from a consumer reporting agency regarding your creditworthiness or credit history.
4. Information from other outside sources regarding your employment, credit, or other relationship with you, or verifying representations made by you to them, such as your employment history, loan or credit card balances.

Sharing Information with Third Parties

We may share Customer Information with unaffiliated third parties who perform services for SSG or in connection with servicing or processing accounts, products and services that you have with us. These companies may include other financial service providers such as insurance companies, payment processing companies, check printing and data processing companies. These companies might assist us in a number of ways; for example, in fulfilling your service requests, or processing your transactions, providing reports for you and your advisor, or mailing your account statements.

We may also disclose Customer Information we maintain about you to credit bureaus and similar organizations, when required or permitted by law. Such shared information may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, an audit or examination. In addition, we may exchange customer information with reputable reference sources and clearinghouse services for purposes of credit reporting and verification.

SSG will provide notice of its privacy policy annually, as long as you maintain an account with us. SSG reserves the right to make changes to this policy.

The statement of this Privacy Policy is available at our home office, on the company website and wherever other such documents may be required to be available.

SSG will provide its existing customers with an initial privacy notice, and thereafter will provide annual privacy update notices. The Compliance Officer is responsible for implementing and monitoring this policy.