

FideliTrade Incorporated is committed to safeguarding the personal information that you provide us. This Privacy Policy describes how we handle and protect personal information we collect about individuals, such as you, who apply for or receive our products and services. The provisions of this notice apply to former customers as well as our current customers.

### **Why and How We Collect Personal Information**

When you apply for or maintain an account with FideliTrade, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. The personal information we collect about you includes:

- Information you provide to us on applications and other forms;
- Information about your transactions with us and with our affiliates;
- Information we receive from consumer reporting agencies and other entities not affiliated with FideliTrade; and
- Information you provide to us to verify your identity, or information received from other entities not affiliated with FideliTrade.

### **How We Protect Personal Information**

We limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and help you accomplish your objectives. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. We maintain physical, electronic and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone.

### **Sharing Information With Our Affiliates**

We may share personal information described above with our affiliates for business purposes, such as servicing customer accounts and informing customers about new products and services, and as permitted by applicable law.

The information we share with affiliates for marketing purposes may include the information described above, such as name, address and FideliTrade account information, but will not include other credit information, such as credit history appearing on a consumer credit report or net worth and income information appearing on applications for our products and services.

### **Disclosure to Non-Affiliated Third Parties**

In order to support the financial products and services we provide you, we may share the personal information described above with third-party service providers and joint marketers not affiliated with us, including:

- Financial service institutions (e.g., advisers, dealers, brokers, trust companies, and banks) with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and
- Companies under contract to perform services for us or on our behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and marketing services.

These companies acting on our behalf are required to keep your personal information confidential.

Also, we may disclose personal information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

### **Accessing and Revisiting Your Personal Information**

We endeavor to keep our customer files complete and accurate. We will give you reasonable access to the information we have about you. Most of this information is contained in account statements that you receive from us and applications that you submit to obtain our products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have a question or concern about your personal information or this privacy notice, please contact your FideliTrade representative.