

&PARTNERS

PRIVACY NOTIFICATION

&Partners (“AP”) provides investment brokerage services by means of its own internal operation and those of its clearing firms and other unaffiliated third-party providers such as mutual funds, limited partnerships, and variable product sponsors. AP acts as an introducing broker to its clearing firms which in turn processes the transactions and act as the account custodian. All of the above-named parties receive and maintain information about you that is related to and necessary for processing investments in your account. This Privacy Policy does not apply to personal information collected from residents of California, for whom we provide separate privacy policies and notices.

WHERE DO WE OBTAIN THE INFORMATION? The information that we have comes directly from you. This includes such information as your name, address, and Social Security number that you provided on applications, agreements, or other forms. In addition, we maintain records of each of your transactions and holdings processed by us.

We also may obtain information about you, such as your credit history or other facts relating to creditworthiness, from a consumer-reporting agency.

TO WHOM DO WE DISCLOSE THE INFORMATION? We provide information about current or former clients from the sources described above to parties outside of this firm only as described below:

To other companies as necessary to process your business. For example, we process your mutual fund and variable product transactions through product providers with whom we have dealer selling agreements. If you have a trading account, the information that we obtained from you is given to the clearing firm for purposes of facilitating securities trading and statement preparation. These parties must limit their use of the information to the purpose for which it was provided.

To your Registered Representative/Investment Advisor Representative (“FA”). For the marketing of other services by your FA to you, or in order for your FA to provide continuing service if your FA terminates from AP.

Where required by law or regulation. Examples include responses to a subpoena, court order or regulatory demand.

As authorized by you. You may direct us, for example, to send account statements or other account information to a third party.

As otherwise authorized or permitted by law. For example, the law permits us to respond to a request for information about you from a consumer-reporting agency.

CONFIDENTIALITY AND SECURITY. We restrict access to information about you to those employees and authorized agents who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards to maintain the confidentiality of your information. We treat any information regarding you and your account(s) as confidential information, which shall only be used by AP and your FA solely in their efforts to perform services indicated herein. Additionally, AP shall comply with all applicable privacy rules and regulations regarding your nonpublic personal information. Notwithstanding the above, you understand that any non-public personal information may be disclosed to AP affiliates and necessary third parties in order to perform advisory services. This confidentiality provision shall survive the cancellation, expiration or termination of your advisory account agreement.