
PRIVACY NOTICE TO OUR CLIENTS

We are providing you with this information as required by Regulation SP adopted by the Securities and Exchange Commission.

Information about what we collect

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others.

Our use of information about you

We do not disclose any nonpublic personal information about you to anyone unless one of the following conditions is met:

- We receive your prior written consent;
- We believe the recipient is your authorized representative;
- We are permitted by law to disclose the information to the recipient in order to service your account(s), or
- We are required by law to disclose information to the recipient.

We follow the same policy with respect to nonpublic information received from all clients and former clients.

How we protect your confidential information

We restrict access to nonpublic personal information about you to those employees who have need for that information to provide investment services to you, or to employees who assist those who provide those services to you. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information.
