

## NBC Securities Privacy Policy

### Our Commitment to your Privacy

Protecting our clients' privacy is very important to NBC Securities. We understand that you have entrusted us with your private financial information and we do everything we can to maintain that trust. Outlined below, you will find the details of the personal information we obtain and the manner in which it may be shared.

### What types of information do we collect/share?

The types of personal information we collect and share depend on your account/s and product/s. This information can include:

- Social Security number and income
- Assets and investment experience
- Account balance and transaction history

### Why do we share this information?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to ensure your understanding.

### How is it shared?

All financial companies need to share customers' personal information to operate their business. In the section below, we list the reasons financial companies may share their customers' personal information; the reasons NBC Securities, Inc. chooses to share; and whether you can limit this sharing.

Why we can share your personal information	Does NBC Securities, Inc. share?	Can you limit this sharing?
<b>For our business purposes -</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes -</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	NBCS Does Not Share
<b>For our affiliates' business purposes -</b> information about your transactions and experiences	Yes	No
<b>For our affiliates to market to you</b>	No	NBCS Does Not Share
<b>For our affiliates' business purposes.</b> information about your creditworthiness	No	NBCS Does Not Share
<b>For our nonaffiliates to market to you</b>	No	NBCS Does Not Share

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, your information may continue to be shared as described in this notice.

**Questions?**

Call (800) 521-9390(toll-free) or go to <http://www.nbcsecurities.com/privacy-policy>

**Who is providing this notice?**

NBC Securities, Inc. is a full-service broker/dealer and registered investment advisor providing investment services to retail and institutional clients.

**How does NBC Securities, Inc. protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

**How does NBC Securities, Inc. collect my personal information?**

We collect your personal information, for example, when you:

- open an account or seek advice about your investments
- buy or sell securities or make deposits/or withdrawals
- enter into an investment advisory contract
- visit our website

**Why can't I limit all sharing?**

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

**What happens when I limit sharing of an account I hold jointly with someone else?**

We limit sharing by individuals, not accounts. Your choices will apply to you individually and to everyone with whom you hold an account jointly at the time you make your choices. You must tell us at or after the time you open or hold an account jointly with someone else if you wish to apply your choices to them.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include:

- *NBCS Holdings GP*
- *NBCS Holdings LP*

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *NBC Securities, Inc. does not share with nonaffiliates to allow them to market to you.*

### **Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *NBC Securities, Inc. does not jointly market.*

### **Other important information**

NBC Securities, Inc. has entered into a Protocol for Broker Recruiting with certain other brokerage firms under which your NBC Securities, Inc. financial advisor may take your personal information—specifically, your name, address, telephone number, email address, and account title—in the event your financial advisor leaves NBC Securities, Inc. and joins one of the other member brokerage firms. If you are an NBC Securities, Inc. client and choose to limit this sharing, NBC Securities, Inc. will notify your financial advisor of your decision to keep your personal information confidential and that you do not want your personal information shared by your financial advisor with his/her new firm. To limit this sharing, call (800) 521-9390 (toll-free) Monday – Friday, 8:00am – 4:30pm CT.

For Vermont Members/Customers: We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

For California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account.

## **California Privacy Notice**

This CALIFORNIA PRIVACY NOTICE supplements the information contained in the Privacy Statement of NBC Securities, Inc. (“we”, “us”, “our”) and applies solely to the rights of California residents with respect to “Personal Information” as defined in the California Consumer Privacy Act (“CCPA”). Any capitalized terms used in this policy have the same meaning as in the CCPA unless otherwise defined.

### **Personal Information We Collect**

As used in this California Privacy Notice, “personal information” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include: (i) publicly available information from government records; (ii) de-identified or aggregated consumer information; or (iii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) and the Gramm-Leach-Bliley Act (GLBA).

We have collected the following categories of personal information from consumers within the preceding twelve (12) months:

- A. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.

**Source** - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

**Business purpose for collection** - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or

fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- B. The personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) include name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

**Source** - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

**Business purpose for collection** - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- C. Protected classification characteristics under California or federal law such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

**Source** - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

**Business purpose for collection** - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

**Source** - We collect this data from the consumer, the consumer's transactions within an account, counterparties to these transactions, and from government agencies, registries or public records.

**Business purpose for collection** - We collect this data to comply with applicable law, market to clients and service clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, preventing fraud, processing payments, providing advertising or marketing services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- E. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.

**Source** - We collect this data from reviewing the consumer's electronic browsing history on our website.

**Business purpose for collection** - We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf.

- F. Geolocation data

**Source** - We collect this data from reviewing the geolocation data revealed when a consumer accesses our website.

**Business purpose for collection** - We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf.

- G. Audio, electronic, visual, thermal, olfactory, or similar information.

**Source** - In compliance with any applicable notice requirements, we may record phone calls.

**Business purpose for collection** - We collect this data as may be required by law or to verify trade or other instructions given to us.

**Parties with whom information can be shared** - We share this information with service providers so that they can store information on our behalf.

- H. Professional or employment-related information.

**Source** - We collect this data from the consumer.

**Business purpose for collection** - We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf.

- I. Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

**Source** - We collect this data from the consumer.

**Business purpose for collection** - We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf.

- J. Inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**Source** - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

**Business purpose for collection** - We collect this data to market to clients and potential clients, providing advertising or marketing services, providing analytic services, or providing similar services.

**Parties with whom information can be shared** - We share this information with service providers so that they can process information on our behalf.

## Personal Information We Sell

We do not sell personal information and have not sold consumer's personal information in the preceding twelve (12) months.

## Consumer Rights Under CCPA

The CCPA provides Consumers with certain rights regarding their Personal Information. If you are a Consumer (hereafter "you" or "your" refers to a Consumer), this notice describes your CCPA rights and explains how to exercise your rights.

### Right to Access

You have the right to request, up to 2 times every 12 months, that we disclose to you the following:

- The categories of personal information we have collected about you.
- The categories of sources from which such personal information is collected.
- The business or commercial purpose for collecting your personal information.
- The categories of personal information about you disclosed for a business purpose during the last 12 months and the categories of third parties to whom such personal information was disclosed.
- The specific pieces of personal information we have collected about you.

You have the right to request a printed or electronic copy of your Personal Information.

We will disclose the applicable information specified above to you upon receipt of your verifiable consumer request. **See "Submitting a Verifiable Consumer Request" section below.**

**Right to deletion**

You have the right to request that we delete any personal information about you which we have collected from you, subject to certain exceptions allowed under applicable law.

**Submitting a Verifiable Consumer Request—How to Exercise Rights of Disclosure or Deletion**

We are required to provide the information specified above to you, or delete information in response to your request, only upon receipt of a verifiable consumer request. Your request must provide information to us that enables us to verify your identity (and, as applicable, of your authorized representative) in order for us to respond to your request. Upon receiving a request pursuant to this Policy, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. We will take reasonable steps to verify your identity (or the identity and authority of your authorized representative) prior to responding to your requests under CCPA. You agree to respond to reasonable requests by us for additional information to enable us to verify your identity in connection with your requests for information or deletion of information under the CCPA.

**To submit a verifiable consumer request after January 1, 2020**

Contact us by telephone at (800) 521-9390 (toll free) between 8:00 a.m. and 4:30 p.m. Central Time

Once your request is verified, we will promptly take steps to disclose and deliver, free of charge to you, the personal information required by the CCPA. We will deliver the information to you by mail or electronically within 45 days of receipt of your request, or such additional time as may be permitted under the CCPA.

**Right to Nondiscrimination**

We will not discriminate against you because you elect to exercise any of your rights under the CCPA including, but not limited to:

- Denying goods or services to you.
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties on you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

None of the foregoing, however, prohibits us from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to us by your data.

**Security of Personal Information**

We seek to protect Personal Information by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards designed to protect Personal Information within our organization. We provide employee training in the proper handling of Personal Information.

**Updates**

This California Privacy Notice was last updated on January 1, 2020. We may modify this California Privacy Notice at any time. For questions concerning our privacy policies and practices, you may contact us by telephone at (800) 521-9390 (toll free) between 8:00 a.m. and 4:30 p.m. CST.