



# PRIVATE ADVISOR GROUP

# PRIVACY POLICY

Private Advisor Group LLC and its affiliates and subsidiaries ("Private Advisor Group", "we", "us", "our") respect and value your privacy and want you to be familiar with how we collect, use, protect, and disclose information from and about you. This Privacy Policy ("Policy") describes our practices in connection with information collected through our websites, mobile application, and other Private Advisor Group services or products ("Services").

This Policy applies to our collection of personal information (i.e. information that may identify, relate to, describe, references, is capable of being associated with or could reasonably be linked, directly or indirectly, with you or your device). This privacy policy applies to consumers, including website visitors and potential clients. If you are an employee, please refer to the personnel privacy policy. If you are looking for GLBA-specific disclosures, please refer to our Consumer Privacy Notice.

## How Do We Collect Personal Information

- **From you.** We may collect personal information and other information that you voluntarily provide when taking certain actions, such as when you use our Services, register with Private Advisor Group online, interact with our affiliated Advisors, sign up for newsletters, or otherwise communicate with us.
- **From devices you use when you interact with us online.** This includes information collected through our Services and automatically from devices you use to connect to our Services. For more information about this, please see our "Cookies and similar technologies" section below.
- **From third parties and publicly available sources.** This includes personal information we collect from other public sources including, but not limited to, websites that enable social sharing, social media sites, and from our Service Providers, Third Parties, vendors and suppliers, our affiliates, or other individuals and businesses.
- **From you in person.** This includes information you may give one of our Advisors if you meet with them in person.

## Types of Personal Information We May Collect From You

Depending on how you interact with us and our Services, we may collect the following information:

- Contact Information such as name, email address, zip code, phone number, and home address.
- Biographical and Identifying Information such as date of birth, location, and Social Security Number.
- Financial Information such as your income, investment preferences, accounts with us and other financial institutions, as well as other financial details.
- Health Information you voluntarily provide to us such as medical or disability information.
- Internet Usage Information such as browsing history, search history, information regarding your interaction with our online services or advertisements, IP address, browser type, log files, recorded sessions, and clickstream data.
- Device information. Such as browser or device model and settings, operating system, and unique identifiers, and the version of the app you're using.
- Inferences such as inferences drawn from any of the personal information we collect to better understand your preferences.
- Account Information such as information you provide when you create an account, like username and password.
- Transaction and Trading Information such as trading activity, holdings information, and information needed to complete your transactions or otherwise provide our products and services, such as your bank account



- information, and your transaction history.
- If you submit any personal information relating to other people to us, such as information about other account holders or beneficiaries, you represent that you have the authority to do so and to permit us to use the information in accordance with this policy.

## How We May Use Your Personal Information

We may use information you provide us through our online services to:

- Provide, market, and develop our products and services. Private Advisor Group collects information to provide our services, maintain our websites and mobile applications, and better understand the interests of our clients and investors who use our services and products.
- Process transactions and administer your account. We may use your information to process your transactions and requests, and offer our products and services that may be of interest to you, such as for your financial planning.
- To process your employment application. We may use your information to process employment applications, including verifying statements made on your application (e.g., credit and employment history), performing background and credit checks.
- Communicate with you. We may use your information to respond to your inquiries and send you communications regarding our products and services.
- Develop new products and services and quality assurance. We may use personal information to study, develop, and improve our products and services. We may also aggregate, anonymize, and/or de-identify personal information we collect and use it for any purpose, including product development and improvement activities.
- Security and fraud prevention. We may use personal information to monitor, detect, and prevent fraud and improper or illegal activity. It may also be used to investigate any suspected fraud, harassment, or other violations of any law, rule, or regulation, the terms, rules or policies of our online services, or the rights of third parties, or to investigate any suspected conduct which we deem improper. We may also use it to enforce our Terms of Use and any other agreements between you and Private Advisor Group.
- Verify your identity and verify our records. We may use personal information to verify your identity for the purposes of responding to a request regarding your personal information that you make. This information may also be used to verify our own records for accuracy.
- Debugging and Performance of Systems. We may use your personal information to secure our online services including our network and websites and to debug our online services. We may also use it to diagnose problems and ensure that our online services function properly, make our online services easier and more convenient to use, and otherwise administer our online services.
- Comply with law. We may use personal information to comply with our legal and regulatory obligations, to defend ourselves in litigation and investigations, and to prosecute litigation.
- Internal business purposes. We may use personal information for our internal business purposes, such as data analysis, audits, and enhancing our Services. We may also use inferences drawn from personal information to create a profile reflecting your preferences so we can tailor our Services to you.
- In accordance with our financial services Consumer Privacy Notice and to Enforce Our Terms of Use and Any Other Agreements. We may use your information in the ways indicated in our Private Advisor Group Consumer Privacy Notice and to enforce our Terms of Use and any other agreements.

## How We Disclose Personal Information

We may disclose personal information in the following ways:

- **Private Advisor Group Affiliates.** Private Advisor Group may disclose personal information with Private Advisor Group Affiliates for the purposes described in this Privacy Policy. Consumers who visit Private Advisor Group Affiliates' services should still refer to their separate privacy policies, which may differ in some respects from this Privacy Policy.
- **Service Providers.** We may provide personal information to vendors, contractors, business and service partners, or other third parties who provide services to us including data storage firms, payment companies, technology



suppliers, technology services, customer service, risk solution providers, analysis firms, fraud prevention companies, advertisers, marketers, and others.

- **Collaborators and Advisors.** We may disclose personal information with collaborators with whom we jointly develop or promote our services, such as our Advisors.
- **Government, regulatory, or law enforcement agencies.** We reserve the right to disclose your information to respond to valid information requests from government authorities and judicial requests, to investigate potential fraud, or where otherwise required by law. We may disclose your personal information where we believe the disclosure is necessary or appropriate to comply with regulatory or legal requirements or to protect the safety, rights, or property of ourselves and others and to exercise, establish, or defend our legal rights.
- **At your direction.** We may disclose your personal information at your direction or with your consent.
- **Other financial institutions.** If you are an Advisor, we and our partners may sell your personal information to other financial institutions for those financial institutions' own marketing efforts and purposes.
- **Aggregate Data.** We may disclose your personal information in an aggregated or non-identifying form or otherwise in a form that cannot reasonably be used to identify you.
- **In connection with a merger, acquisition, or business transfer.** If Private Advisor Group sells all or part of its business or makes a sale or transfer of its assets or is otherwise involved in a reorganization, merger, or transfer of all or a material part of its business (including in connection with a bankruptcy or similar proceedings), Private Advisor Group may transfer or disclose your information to the party or parties involved in the transaction as part of that transaction.
- **Mobile information.** Mobile information will not be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

## Children's Privacy

You must be 18 years or older to use our Services. Our Services are for a general audience, are not targeted to children, and do not knowingly collect personal information from children under 18 years of age.

## Links to Third Party Websites

We may provide links to websites and other third-party content (e.g., social media platforms) that are not owned or operated by us. The websites and third-party content to which we link may have separate privacy notices or policies. We are not responsible for the privacy practices of these websites.

If you provide any personal information through a third-party site, your interaction and your personal information will be collected by and controlled by the privacy policy of that third party site. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties, which are not governed by this Privacy Policy.

## Advertising and Opt-Out Disclosures

When you use our Services, our third-party advertising partners, social media providers and analytics providers may collect personal information about your online activity on our Services and on third party websites.

These providers may set web tracking tools (e.g., cookies and web beacons, as discussed further below) to collect information regarding your online activity. In addition, our advertising partners may use this information to deliver advertisements to you when you visit third party websites within their networks. If you would like more information about this practice and to know your choices with respect to it, please either visit the Digital Advertising Alliance's opt-out page (currently available at <http://www.aboutads.info/choices/>) or the Network Advertising Initiative's opt-out page (currently available at <http://www.networkadvertising.org/choices/>). Please note that you may continue to receive generic ads that are not based on your preferences.

## Information Security

We use commercially reasonable administrative, technical, personnel, and physical measures designed to safeguard information in its possession against loss, theft, unauthorized use, disclosure, or modification. However, the



confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting personal information over the internet. We cannot guarantee that unauthorized third parties will not gain access to your information; therefore, when submitting personal information to us, you do so at your own risk.

## **Cookies and Similar Technology**

We and our partners use various tools to collect data when you visit our sites and apps, including cookies, pixels, localStorage, and other similar technologies. Some of these technologies store data in the browser or on your device. Other technologies may use network-related or other information to recognize your device (e.g., IP address). Our Services use these technologies, for example, when you first request a web page and data is then stored on your computer or other device so the website or mobile application can access personal information when you make subsequent requests for pages from that Service. These technologies may also be used to collect and store information about your usage of the Services, such as pages you have visited, other content you viewed, and search history. Additionally, we may use these technologies to collect analytics and measure the use of our Services.

We and our partners may also use these technologies to gather personal information about how you view and use our Services and content, and to connect your activity with other data we store about you. We and our partners may collect your personally identifiable information about your online activities over time and across different websites when you use the Services. The use of these technologies helps us serve you better by understanding what you are interested in, tracking trends, measuring the effectiveness of ads, saving your preferences, and storing information you may want to retrieve on a regular basis. We also allow specific, approved partners to collect data from your browser or device for advertising and measurement purposes using their own similar tools.

Your web browser can be set to allow you to control these technologies, such as whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting these technologies such as cookies. To find out more about cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org). Depending on the make and model of your phone, you may be able to use device settings to opt out of the use of certain device IDs for targeted advertising. For more information about Google Analytics, please review the site “How Google uses data when you use our partners’ sites or apps,” located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). To opt out of Google Analytics specifically, please go to <https://tools.google.com/dlpage/gaoptout>.

Some browsers permit the user to send a “Do Not Track” (“DNT”) preference to websites that the user visits indicating that the user does not wish to be tracked over time and across websites. Because there is not yet a common understanding of how to interpret DNT, we do not currently respond to the DNT signal on our websites. We do, however, respond to global privacy preferences when required by law.

## **Your Marketing Preferences**

We may periodically send promotional materials or notifications related to our Services. If you no longer wish to receive promotional marketing materials from us, you may opt out of receiving such materials. You may unsubscribe from receiving marketing or other commercial emails from us by following the instructions included in the email. You may unsubscribe from text messages you previously consented to by following the prompt provided on our messages. We will work to comply with your request promptly.

There are certain service notifications and other non-promotional emails that you may not opt-out of, such as notifications of changes to our Services or policies, and notifications required by regulation.

## **Suspicious Email**

It is our policy not to email you or send you electronic communications to request non-public personal information or account information (such as a username or password). If you receive an unsolicited email or other electronic communication that appears to be from Private Advisor Group but you suspect may be from another source and might



be fraudulent, please email us at [Privacy@privateadvisorgroup.com](mailto:Privacy@privateadvisorgroup.com).

## **Social Media**

You may also find additional information on our products and services through our social media sites such as Facebook, LinkedIn, or Twitter. Please keep in mind that any information you share is visible to all participants on these social media sites and you should never post any sensitive personal information (such as account number or tax identification). Please carefully review the Terms of Use and Privacy Policy on these social media sites as they may be different than our own policies.

## **Storage and Protection of Personal Information**

Private Advisor Group has a dedicated group that designs, implements and provides oversight of information security. We also monitor our systems infrastructure in order to detect weaknesses and potential intrusions.

In order to help secure personal information collected from you as an Private Advisor Group online services user, including sensitive financial data, the information is protected by SSL encryption when it is exchanged between your web browser and Private Advisor Group online services. However, the internet is not a fully secure environment, and we cannot ensure or warrant the security of any information transmitted to or generated by Private Advisor Group in connection with Private Advisor Group online services. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our administrative, technical, and physical, or other operational, safeguards. You play a critical role in protecting your information by maintaining up-to-date computer security protections. Steps you take to ensure the security of your computer, computer passwords, or other personal identifier authentication mechanisms are key components of the protection of your personal information. For more information on protecting your electronic information, please visit our Privacy/Security page. You agree that you are responsible for any additional verification procedures and security you deem necessary.

By using Private Advisor Group services, you agree that the procedures provided for in this Privacy Policy and the procedures implemented on Private Advisor Group services to protect personal information and to verify the identity of users including, but not limited to, those procedures described in the foregoing paragraph, constitute commercially reasonable website security and customer verification procedures.

## **Notice to Persons Accessing the Private Advisor Group Site Outside the United States**

If you access the Private Advisor Group online services outside the United States, any information you provide to us through the Private Advisor Group online services will be transferred out of that jurisdiction and into the United States. If you do not want your personally identifiable information to leave that jurisdiction, do not provide the information to us. By providing personally identifiable information to us, you explicitly consent to the transfer of your information to the United States.

## **Updating and Correcting Your Personal Information**

Keeping your information accurate and up to date is very important. If your personal or account information is incomplete, inaccurate or not current, please feel free to update your profile accordingly online, contact your financial professional, or email us at [Privacy@privateadvisorgroup.com](mailto:Privacy@privateadvisorgroup.com).

## **California Consumer Privacy Act Notice**

California residents have certain rights with respect to their personal information, as described below. We have provided detailed descriptions above in the “How Do We Collect Personal Information,” “Types of Personal Information We May Collect From You” “How We May Use Your Personal Information,” and “How We Disclose Personal Information” sections of this Privacy Policy. This section provides information for California residents in connection with the California Consumer Privacy Act (“CCPA”). Under the CCPA, and for purposes of this Section, “Personal Information” generally means information that identifies, relates to, or describes a particular California resident.



## What We Collect

In the past 12 months, we have disclosed (or have enabled you to disclose) and have collected the following categories of Personal Information. Additionally, we do not knowingly “share” or “sell” Personal Information of minors under 16 years of age.

CATEGORY	CATEGORIES OF PARTIES TO WHOM INFORMATION IS DISCLOSED	CATEGORIES OF THIRD PARTIES TO WHOM INFORMATION IS SOLD AND/OR SHARED
Identifiers, including first and last name, email address, phone number, address, IP address, online and device identifiers, and military and/or veteran status.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Personal information, as defined in the California Customer Records law, including contact information, bank account number, and other financial information.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Internet or network activity information, including browsing history, search history, and information regarding a consumer’s interaction with an internet website, device software platform/OS and firmware, mobile carrier, and preferred languages.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Commercial information, including financial information, such as products or services purchased or considered.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Analytics providers, advertising providers, and lead generation providers.



Characteristics of protected classifications under California law, demographic information, including your gender, age, date of birth, citizenship status, and marital status.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Audio, electronic, visual and other similar information, including your profile picture and/or recordings of customer service calls.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Geolocation data, including non-precise geolocation information, approximate location as inferred from IP address.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Professional or employment-related information, such as work history and prior employer.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Analytics providers.
Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.
Other information you may share if you use social features when accessing our Services, including the organizations, links, and other information included on your social profile page.	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers.



Sensitive Personal Information, such as social security number, trade union membership, health data, Advisor’s racial or ethnic origin	Service providers, customer service providers, and other providers or partners that support our operational business purposes, such as Advisors.	Advertising providers, analytics providers
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Please note that we may process Personal Information in each of the above categories in order to protect ours and others’ rights, and/or to complete a merger or sale of assets or other corporate transaction, including bankruptcy, or other similar transaction involving all or any portion of our business.

**Data Retention**

We will retain your Personal Information from or about you as reasonably necessary and proportionate to achieve the purpose(s) for which the Personal Information was collected or processed as outlined in this Privacy Notice, unless a longer retention period is required or permitted by law.

**Purposes**

We may use this Personal Information for the following purposes, including commercial purposes:

- to operate, manage, and maintain our business;
- to provide our products and services;
- to accomplish our business purposes and objectives, including:
- developing, improving, repairing, and maintaining our products and services;
- personalizing, advertising, and marketing our products and services;
- conducting research, analytics, and data analysis;
- maintaining our facilities and infrastructure;
- quality and safety assurance measures;
- conducting risk and security controls and monitoring;
- detecting and preventing fraud;
- performing identity verification;
- performing accounting, audit, and other internal functions;
- complying with the law, legal process, and internal policies;
- maintaining records; and
- exercising and defending legal claims.

Depending on your interactions with us, we may not have used Personal Information collected about that resident for each (or any) of these purposes.

**Sources of Personal Information**

We collect this Personal Information directly from California residents themselves, as well as from social media platforms (e.g., if the individual has connected a social media account to our website or apps); referrals; joint marketing, co-branding, co-promotional, or advertising partners; Advisors; and sources of demographic and other information, including through devices you used to interact with us through our Services. The sources of personal information collected are noted in the “How Does Private Advisor Group Collect Information” and “What Information does Private Advisor Group Collect” sections above.





## Rights and Choices Available to California Residents

If you are a California resident, you may have the following rights with respect to any information about you that constitutes "Personal Information" under California law:

**Request to Know and Access Your Personal Information:** You may access the information we maintain about you using the methods provided below. If we grant your request, we will provide you with a copy of the personal information we maintain about you in the ordinary course of business. This may include what personal information we collect, use, or disclose about you. We may not fulfill some or all of your request to access as permitted by applicable law. Please note that, in some instances, we may decline to honor your request or only honor your request in part, where, for example, we are unable to verify your identity or an exception to this right applies.

**Request to Delete Your Personal Information:** You may request that we delete your personal information. Depending on the scope of your request, we may refrain from granting your request, as permitted by applicable law. For example, as permitted by applicable law, we may retain your information in our business records. You may submit a deletion request using the methods provided below. Please note that, in some instances, we may decline to honor your request or only honor your request in part, where, for example, we are unable to verify your identity or an exception to this right applies.

**Request to Opt-Out of "Sale" and Certain Sharing Practices:** You have a right to opt-out of the sale or share of your personal information, as defined by California law. In order for you or your authorized agent to exercise this right, please visit our "Do Not Sell or Share My Personal Information" page. We also honor alternative opt-out signals, such as the GPC. We process opt-out preference signals in a frictionless manner.

**Request Correction of Inaccurate Personal Information:** You have a right to request the correction of inaccurate personal information that we may have on file about you. Please note that, in some instances, we may decline to honor your request or only honor your request in part, where, for example, we are unable to verify your identity or an exception to this right applies.

**Non-Discrimination:** We will not discriminate against you, in terms of price or services that we offer, if you submit one of the requests listed above.

**Limit the Use of Sensitive Personal Information.** You have a right to limit the use of your sensitive personal information. Please note that, in some instances, we may decline to honor your request or only honor your request in part, where, for example, we are unable to verify your identity or an exception to this right applies.

### Authorized Agent:

California consumers may use an authorized agent on their behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a California consumer to communicate with us or to exercise a privacy right discussed above, you must be able to demonstrate that you have the requisite authorization to act on behalf of the resident and have sufficient access to their laptop, desktop, or mobile device to exercise these rights digitally. If you are an authorized agent trying to exercise rights on behalf of a consumer, please contact us at the contact information below with supporting verification information, proof that you have access to the consumer's interface, and proof of your own identity.

### To Exercise Your Rights

In order to exercise your Right to Opt-Out of the Sale or Sharing of your Personal Information, please visit our "Do Not Sell or Share My Personal Information" page.

In order to exercise your Right to Limit the Use of Your Sensitive Personal Information, please complete this page here. Please note that the information in this page is necessary for us to correctly identify you and process your request.



In order to exercise your other rights described above, please navigate to our online web portal available here or call. We may need to obtain information about you or your specific request in order to verify your identity and respond.

### **Shine the Light Disclosure**

We do not share personal information as defined by California Civil Code § 1798.83 (the “Shine the Light Law”) with third parties, other than our affiliates, for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light Law by sending an email to [privacy@privateadvisorgroup.com](mailto:privacy@privateadvisorgroup.com) or by sending a letter to Private Advisor Group, 305 Madison Avenue, P.O. Box 1820, , ATTN: Privacy Office, Morristown, NJ 07962. Any such request must include “Request for California Privacy Information” in the subject line and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the email address or mailing address referenced above.

### **Contacting Us About Privacy Questions**

If you have questions or concerns regarding this Privacy Policy, you should contact us by email at [privacy@privateadvisorgroup.com](mailto:privacy@privateadvisorgroup.com).

### **Changes to the Privacy Policy**

We reserve the right to modify or supplement this Online Privacy Policy at any time. Therefore, we recommend that you review this Online Privacy Policy, updated and posted on this Site, regularly for changes. If we make changes to the Privacy Policy, we will revise the “Last Updated” date at the top of this Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the site. Your use of Private Advisor Group services following these changes means that you accept the revised Privacy Policy.