

# Privacy Notice

Our Commitment to You

- Effective Date – October 1, 2009

# Our Commitment to You

LPL Financial Corporation (“LPL Financial”) and its family of affiliated companies are committed to maintaining the trust and confidence of our customers. We want you to understand how we protect your privacy when we collect and use your nonpublic personal information (“personal information”) in the course of business, as well as the measures we take to safeguard your personal information. Keeping personal information secure and private is a priority at LPL Financial.

The following members of the LPL Financial family of companies subscribe to this Privacy Notice: LPL Independent Advisor Services Group, LLC, Associated Financial Group, Inc., Associated Securities Corp., Associated Planners Investment Advisory, Inc., Mutual Service Corporation, Mutual Services Mortgage, LLC, MSC Insurance & Securities, Inc., Mutual Service Corporation (Nevada), Waterstone Financial Group, Inc., Independent Advisors Group Corporation, LPL Insurance Associates, Inc., PTC Holdings, Inc., The Private Trust Company, N.A. and UVEST Financial Services Group, Inc. We will refer to these affiliates variously as “our affiliates,” “our affiliated companies,” and “affiliates.”

## How We Collect Your Personal Information

While providing service to you, we collect personal information from the following sources:

- Account applications and other standard forms related to your accounts. Examples of information collected include your name, address, Social Security number, assets, types and amounts of investments, transactions and income.
- Your transactions with LPL Financial and its affiliated companies, including those that work closely with LPL Financial to provide you with diverse financial products and services. Examples of information collected include your account balance, payment history, parties to transactions, types and amounts of investments, transactions, and credit card usage.
- Consumer reporting agencies, including information concerning your credit worthiness and credit history.
- Information obtained from third parties when verifying applications or other forms. This may be obtained from your current or past employers or from other institutions with which you conduct financial transactions.

Keeping your information secure is one of our most important responsibilities. We restrict access to your personal information to those employees and agents who assist us in providing products or services to you. We maintain physical, electronic and procedural safeguards that comply with applicable law to protect your personal information. We train our employees in the proper handling of personal information. When we use other companies to help provide our services to you, we require them to protect the confidentiality of personal information they receive.

## Use of “Cookies”

We may occasionally use a “cookie” in order to provide better service to you, to facilitate your use of our website, to track usage of the website, and to address security issues. (A cookie is a small piece of information that a website stores on a personal computer and can be retrieved later.) We may use cookies for administrative purposes, such as to store your preference for certain kinds of information. None will contain information that will enable anyone to contact you via telephone, email, or any other means. If you are uncomfortable with the use of cookie technology, you can set your computer’s browser to decline cookies. However, if you refuse cookies, you may be unable to utilize certain features of our website, and you may experience performance issues with our website.

## **Disclosing Personal Information to Non-Affiliated Third Parties**

We do not sell, share or disclose your personal information to non-affiliated third-party marketing companies, except personal information we share with other financial institutions pursuant to joint marketing agreements we enter into with them. For example, when banks and credit unions offer investment program services through LPL Financial or its affiliates, those program services may be conducted under joint marketing agreements between us and the banks or credit unions.

We may disclose all of the information we collect, as described above in the section captioned “How We Collect Your Personal Information,” to companies that perform marketing or other services on our behalf and to other financial institutions with which we have joint marketing agreements. All of these companies are contractually obligated to keep the information that we provide confidential and use the information only to provide the services as allowed by applicable law or regulation. They are not permitted to share or use the information for any other purpose. We may also disclose all of the information we collect to our affiliates, as described above in the section captioned “How We Collect Your Personal Information.” To the extent that applicable state laws grant you greater protections in connection with our sharing of your personal information, we will comply with those laws.

We may also disclose your personal information as permitted or required by law. These disclosures may include, for example, information to process transactions on your behalf, to conduct our operations, to follow your instructions as you authorize, or to protect the security of your financial records.

## **For Clients of Independent Advisors**

If your financial advisor terminates his or her relationship with us and moves to another brokerage or investment advisory firm (“New Firm”), we or your financial advisor may disclose your personal information to the New Firm, unless you instruct us not to. If you do not want us or your financial advisor to disclose your personal information to the New Firm, and if you do not want your financial advisor to retain copies of your personal information when your financial advisor terminates his or her relationship with us, you may request that we and/or your financial advisor limit the information that is shared with the New Firm by filling out the Privacy Choices Notice, which is attached to

this Privacy Notice, and mailing it to: Privacy Management; c/o Compliance Department, LPL Financial, 9785 Towne Centre Drive, San Diego, CA 92121-1968. If your primary address is in a state that requires your affirmative consent to share your personal information with the New Firm (such as California or Vermont), then you must give your written consent before we will allow your financial advisor to take any of your personal information to that New Firm. You can withdraw your consent at any time by contacting us in writing at the address provided above.

**If you want to follow your financial advisor to their New Firm when your financial advisor terminates his or her relationship with us, please do not send in the Privacy Choices Notice form.**

## **For Clients of Financial Institutions and LPL Financial and Its Affiliates**

If you are a customer of a bank, credit union, or other financial institution program with which we have a joint marketing agreement (such as under a bank or credit union investment services program) and your financial advisor with whom you work pursuant to that program terminates his or her relationship with us, we will not permit your financial advisor to take your personal information with them or retain copies of it without your written consent and the approval of your bank, credit union, or other financial institution program. However, LPL Financial entered into the Protocol for Broker Recruiting (Protocol) on September 4, 2008, with certain other brokerage firms, and if LPL Financial remains a signatory to the Protocol as of the effective date of your advisor's termination from LPL Financial, then LPL Financial will permit your financial advisor to take your name, address, phone number, e-mail address, and the account title of the accounts serviced (or additional information as permitted if the Protocol is amended) while your financial advisor was associated with LPL Financial if your advisor joins one of these Protocol brokerage firms. The ability to take this customer information may be restricted by agreements between your financial institution and your financial advisor. Note: the Protocol is not applicable to UVEST Financial Services Group, Inc. or its advisors or customers. The personal information of those customers will continue to be treated as provided in the opening sentence of this section.

**Please do not send in the Privacy Choices Notice form as it is not applicable to your account relationship with us.**

## **Disclosing Personal Information to Affiliates**

We do not share your personal information with our affiliated companies for marketing purposes. However, we may share within our family of affiliated companies, information about our transactions or experiences with you, such as your name, social security number, account or payment history and similar information. For example, if you currently do business with one of our affiliates, or if you ask to receive information or offers from them, we may share your personal information with those affiliates. Our affiliates may also continue to use personal information they receive from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

## **If Your Relationship With Us Ends**

If your relationship with us ends, we will continue to treat and protect your personal information in accordance with this Privacy Notice. That means that we may continue to share your personal information with our lending partners and affiliates as described above or permitted by law. However, if you notify us of your election not to have us share your personal information with others before or after your relationship with us ends, we will honor that request.

## **Changes to Our Privacy Policy Notices**

We reserve the right to amend (that is, to add to, delete from, or change) the terms of this Privacy Notice from time to time. Our Privacy Notice, as in effect from time to time, is continually posted on our website. By electing to become one of our customers or by receiving our products and related services, you agree to receive copies of our Privacy Notice and any amendments to it from our website, unless you notify us otherwise in writing at the address provided on page 6. You may view our Privacy Notice online at [www.lpl.com](http://www.lpl.com) (click on Privacy/Security). Notwithstanding the foregoing, we will provide you with a written copy of our Privacy Notice at least annually.

## **Additional State Opt-Out Information**

The information-sharing practices described above are in accordance with Federal law. In states where additional notification is required before you can provide an effective opt-out, we will contact you separately regarding your opt-out choices.

## **View and Change Your Personal Information**

You can review your personal information and make any needed corrections to it by contacting us in writing at the address below.

## **Contact and Right to Access and Correct Information**

You may write to us at the address below with any questions you may have about your personal information. You may see and copy the personal information that we have about you in person. If you prefer, we will copy and send it to you. If you think the personal information that we have in our files is incomplete or incorrect, you may request that we complete or correct the disputed personal information. We will review your request. We will either make the change or explain why we did not do so. If we do not make the change, you may file a written statement of dispute with us. We will include the written dispute in future disclosures of that personal information. We will send the written dispute to anyone you ask who received your personal information from us in the past two years. To exercise these rights, please send us a written request. Please include your name, address, account number, daytime phone number, and the personal information that you would like access to or that you believe needs correction. We may charge a small fee to collect and send the personal information to you. To protect your personal information, we may ask you to verify your identity and to provide other details to respond to your request.

### **Our mailing address for purposes of this Privacy Notice is:**

Privacy Management  
c/o Compliance Department  
LPL Financial  
9785 Towne Centre Drive  
San Diego, CA 92121-1968

# Privacy Choices Notice

(Applicable only to clients of independent advisors)

If you would like to limit the personal information that your financial advisor discloses or takes with him or her to another brokerage or investment advisory firm upon the termination of his or her relationship with LPL Financial, please complete and mail the following form to:

Privacy Management  
c/o Compliance Department  
LPL Financial  
9785 Towne Centre Drive  
San Diego, CA 92121-1968

- Limit the personal information about me that my financial advisor discloses or takes with him or her to another brokerage or investment advisory firm upon terminating his or her relationship with LPL Financial. I understand that you may disclose my name, address, telephone number, email, and the account title of the accounts serviced by my advisor to such brokerage or investment advisory firm.

If you want to follow your advisor to his or her New Firm when he or she terminates their relationship with us, please do not send in this Privacy Choices Notice form.

Customers of banks, credit unions, or other financial institutions with whom we have a joint marketing agreement to provide investment services to you should not send in this form to us.

For your opt-out election to be effective, you must complete ALL of the following information: name, address, account or social security number, signature and date lines.

## Customer 1:

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State/Zip \_\_\_\_\_

Account Number or SSN \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

## Customer 2:

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State/Zip \_\_\_\_\_

Account Number or \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

The LPL Financial family of affiliated companies includes LPL Financial, UVEST Financial Services Group, Inc., Mutual Service Corporation, Waterstone Financial Group, Inc., and Associated Securities Corp., each of which is a member of FINRA/SIPC.

Not FDIC/NCUA Insured	Not Bank/Credit Union Guaranteed	May Lose Value
Not Guaranteed by any Government Agency		Not a Bank/Credit Union Deposit

 [www.lpl.com](http://www.lpl.com)