

Customer Privacy Information



CUSTOMER PRIVACY NOTICE

This Privacy Notice is from Securities America, Inc. ("SAI") and Securities America Advisors, Inc. ("SAA"). SAI is a broker-dealer and an insurance agency and is in the business of providing brokerage services and insurance products to customers. SAA is an investment adviser and is in the business of providing financial planning and investment advisory services to customers. In this Notice, SAI and SAA may be collectively referred to as the "Securities America Companies."

SAI and SAA are owned by Securities America Financial Corporation. While each of the Securities America Companies operates as a separate company, SAI and SAA share personnel and facilities to provide coordinated administrative and support services for clients.

The Securities America Companies are committed to safeguarding your confidential information. Except as required or permitted by law, the Securities America Companies do not share confidential information about you with non-affiliated third parties. In the unlikely event there were to be a change in this fundamental policy, the Securities America Companies will provide written notice to you, and you will be given an opportunity to direct us as to whether disclosure of your confidential information is permissible.

AN IMPORTANT NOTICE CONCERNING OUR CUSTOMERS' PRIVACY

CUSTOMER INFORMATION WE COLLECT. SAI and SAA collect and develop personal information about you. The term "Customer Information" means any type of personally identifiable information provided by you or gathered about you that is not generally publicly known. The essential purpose for collecting Customer Information is to provide and support the financial products and services you obtain from the Securities America Companies. The categories of Customer Information collected by the Securities America Companies depend upon the scope of the engagement with your Securities America Investment Representative, and are generally described below.

As a broker-dealer and insurance agency, SAI collects and develops Customer Information in order to provide brokerage and insurance products and services. Customer information SAI collects includes:

- Information we receive from you on applications or other forms and specifically including your name, address, social security number, income, income tax rate, net worth, financial objectives, risk tolerance and the names of beneficiaries.
- Information we receive or obtain from other sources, including:
 - ◆ Information collected and developed by issuers of securities you own, in order to issue, administer and process transactions in such securities.
 - ◆ For products involving the extension of credit, information about your creditworthiness and credit history that we may obtain from unaffiliated consumer reporting agencies.
 - ◆ Information about your financial products and services transactions with SAA.
- If you apply for insurance products through SAI, we may collect health information that you provide to us.

As a financial planner and an investment adviser, SAA collects and develops Customer Information about you in order to provide investment advisory services. Customer Information SAA collects includes:

- Information the Securities America Companies receive from you on financial inventories through consultation with your SAA Representative. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about your financial products and services transactions with SAA.

DATA SECURITY

The Securities America Companies restrict access to Customer Information to our Representatives and employees who need the information to perform their job responsibilities. The Securities America Companies maintain agreements, as well as physical, electronic and procedural security measures that comply with federal regulations, to safeguard your Customer Information.

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Our Commitment to Protecting Your Privacy

USE AND DISCLOSURE OF CUSTOMER INFORMATION TO PROVIDE CUSTOMER SERVICE FOR YOUR ACCOUNTS

To administer, manage and service customer accounts, process transactions and provide related services for your accounts, it is necessary for us to provide access to Customer Information within the Securities America Companies and to certain non-affiliated companies. For example, our clearing firm prepares periodic statements of account, and it is necessary to provide the clearing firm with information about your securities transactions so that statements of account that accurately reflect your securities transactions can be prepared. The Securities America Companies may share Customer Information with companies related under common ownership (Securities America Financial Corporation is a wholly owned subsidiary of Ameriprise Financial, Inc.) in order to remain in compliance with securities regulation (i.e. The Patriot Act) and in conjunction with internal audits conducted in the normal course of business. Further, we may provide Customer Information outside of the Securities America Companies as permitted by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

USE AND DISCLOSURE OF HEALTH INFORMATION

To the extent you provide health information to SAI for the purpose of making application for insurance products, such information will not be disclosed to non-affiliated companies for any purpose, except:

- to underwrite or administer your insurance policy or related claims;
- as required by law, or
- as authorized by you.

FORMER CLIENTS

If you close an account with either of the Securities America Companies, we will continue to operate in accordance with the principles stated in the Notice.

REQUIREMENTS OF FEDERAL LAW

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act ("GLBA"). The GLBA requires financial institutions, including broker-dealers, investment advisers and investment companies to protect the privacy of Customer Information. To the extent a financial institution discloses Customer Information to non-affiliated third parties other than as permitted or required by law, customers must be given the opportunity and means to opt out (or, prevent) such disclosure. Please note that because the Securities America Companies do not disclose Customer Information to non-affiliated third parties except as permitted or required by law, an opt out mechanism is not necessary.



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