



Privacy Policy Statement

Evolve Securities, Inc. ("ESI") regards customer information as confidential and treats it accordingly. If we share such information with any other parties, it is being done exclusively for the purpose of being able to better serve you through Service Providers or Joint Marketing firms. ESI does not sell your personal information to any 3rd party marketing organizations.

CATEGORIES OF INFORMATION 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; and

Information we receive from a consumer reporting agency.

CATEGORIES OF INFORMATION WE DISCLOSE AND PARTIES TO WHOM WE DISCLOSE

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

We may also disclose nonpublic personal information about you to nonaffiliated third parties as permitted by law.

SERVICE PROVIDER/JOINT MARKETING EXCEPTION

We may disclose the following information to companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements:

Information we receive from you on applications or other forms, such as *your name, address, social security number, assets, and income*;

Information about your transactions with us, our affiliates, or others, such as *your account balance, payment history, parties to transactions, and credit card usage*; and

Information we receive from a consumer reporting agency, such as *your creditworthiness and credit history*.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you such as to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

SPECIFIC DISCLOSURES – BUSINESS PROCESS

ESI understands that customers and consumers (hereinafter jointly referred to as "customers") expect businesses to use their customer information discretely, affording such information the privacy protection that customers and consumers deserve. ESI will not sell or distribute confidential customer information to unaffiliated third parties for purposes of solicitation. However, ESI may provide access to such information to specified parties in order to effectively and efficiently conduct its business. Regardless of later updates or changes to our privacy notice, we will never use any information you submit under our current privacy notice in a new way without first providing you an opportunity to opt-out or otherwise prevent that use. Account and other personal information may be released when we are required to do so by law, court order, law enforcement authority or regulatory agency.

There are a few instances in which customer information will be used in order to process business in an efficient and effective manner. First, if a customer who has a brokerage account at ESI also has an annuity or insurance product that was sold by an agent of Affiliated Financial Services, ESI may utilize such information to the extent permitted by applicable regulations. It could be used by representatives of ESI who are also agents or employees of Affiliated Financial Services. Such information may be used, for example, to determine (i) whether the insurance product or insurance security sold is appropriate or suitable for the customer or (ii) whether the customer may elect to avail him or herself of certain policy options.

Another example of how ESI shares information with other parties involves its securities execution and processing services. In the ordinary course of business, ESI utilizes the processing services of its clearing firm, National Financial Services LLC ("NFS"), as well as mailing and other processing or data management services of third parties. Because of the way that ESI is structured, ESI must utilize a clearing firm such as NFS and statement vendors to mail information to its customers. ESI utilizes NFS to engage in trading, clearance and settlement of customer business. ESI customer account agreement(s) contemplate this relationship. NFS utilizes other companies to fulfill processing, servicing and record retention functions. ESI may also use other service corporations for mailing and other processing-related services. ESI will impress upon such parties the confidential nature of such information and obtain a written agreement from such parties to treat the information as such. For your reference, the NFS Privacy Policy Statement may be found at www.NationalFinancial.com (click on *Fidelity's Commitment to Privacy* at the bottom right of the page).

The business relationships described above help ESI administer its business and provide services and other opportunities to customers, as well as to fulfill certain regulatory requirements contemplated within the securities industry. Such parties are instructed to exercise similar discretion in deference to your privacy rights.

ESI has contractual relationships with financial services organizations, including community banks, insurance companies and agencies, as well as potentially with other service corporations, to sell securities and other financial products. The sales representatives located at the respective financial services organizations are typically employees of such organizations and independent agents of ESI. Such representatives are instructed to afford customer information all due protection. These organizations are part of a Joint Marketing arrangement.

Information collected from customers may be disclosed to independent contractors and business partners who have agreed to hold this information in confidence, not use it for any purpose except to carry out the service they are providing for ESI, and honor our privacy and security policies in the way this information is handled.

ESI may also disclose aggregate, anonymous data based on information collected from customers to actual or prospective investors and partners. Should a sale of ESI's business ever occur, collected customer information may be transferred along with the sale, but the information will be treated confidentially.

SPECIFIC DISCLOSURES – Web Site Matters

Financial Information

Personal information is not collected on our Web Site at the present time. If, at a later date, ESI modifies its Site to collect such information, ESI will be the sole owner. However, ESI's Web Site may at some point provide customer's with the ability to knowingly access Hot Links or links to Service Providers via the ESI Web Site. Under those circumstances, the privacy procedures of those



respective organizations will govern. With respect to ESI's Web Site, ESI will prevent unauthorized access to portion of its Web Site that may contain proprietary or confidential information; if Web access such access is granted to such information, customers and staff of ESI would be assigned a login and password.

If through the publicly available portion of the Web Site, customers request services or to sign up for any other product or service through ESI or its Service Providers, we will authenticate their identity and financial information such as a date of birth, social security number, credit card number and billing address before we will process any such requests. If the customer has not already done so, ESI will have the customer complete the necessary account documentation. We will not sell, share or rent any financial information collected, except as permitted by law.

Internet Protocol (IP) Addresses

IP addresses are collected from all visitors to the ESI Web Site. IP addresses may be used in the operation of our Web Site, to help diagnose problems with our servers and to help prevent fraud.

Data Integrity

We make diligent efforts to maintain accurate information on our customers. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, ESI has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect.

Data Security

ESI has instituted security procedures to protect information collected about our customers. We diligently monitor our systems, which are protected using industry-standard security measures. Secure Sockets Layer ("SSL") connections are used to communicate to our system to protect customer financial information as well as encrypting vital information that customers input through ESI's and NFS' Web Site. However, ESI cannot guarantee that the information submitted to, maintained on, or transmitted from our systems will be completely secure.

Data Access

Customers may access all personal identifiable information that we collect and maintain by contacting the Chief Compliance Officer. They can correct factual errors in personally identifiable information by contacting us at ESI Broker Client Services at (888) 557-0222. To protect customer privacy and security, ESI reserves the right to take reasonable steps to verify customer identity prior to granting access or processing changes or corrections.

Cookies

ESI may use "cookie" technology in order to enhance our clients' online experience and for authentication purposes, associating them with your personally identifiable information. They are also used for measuring certain traffic patterns, and to preclude you from having to re-enter your password during multiple visits to the site.

How Information is Used

ESI may contact customers regarding products and services offered by ESI and its trusted affiliates and Service Providers. We may also use information collected through our Web Site for research regarding the effectiveness of the Web Site and related marketing, advertising and sales efforts. Information will only be made publicly available where mandated by governing agencies or as disclosed in the terms and conditions of our agreements with customers. We will not post any testimonials or comments made by our clients without their explicit permission.

Electronic Mail

Electronic communications may be sent by ESI using customers' personal contact information to inform them of important industry news or about general services and upgrades provided by ESI and its Service Providers. If customers do not wish to receive these industry notices, they can contact the Chief Compliance Officer. However, in order to fulfill our service obligations for customers who elect on-line financial services, ESI will continue to send emails regarding Customers' account administration or service interruptions for system maintenance.

3rd Party

If you opt to process your business via the Web Site or that of our Service Providers, or order third-party products or services made available through any of such Web Sites, we may fill in blanks on the order form for your convenience, using account data that you have previously provided us. This data is displayed for your review before the form is submitted, and you may have the option to delete or modify it before the data is sent.

Miscellaneous Information

Certain additional non-personal types of information is collected and stored whenever customers interact with us. This information is collected to better develop and offer those products and services which are most desired within our industry. For example, although not presently utilized, our systems may track the page to which customers link from ESI and the type of Web browser used. No personally identifiable information will be linked to this aggregated information, which may be shared with partners, market researchers and other third parties on an aggregate, non-personally identifiable basis.

Sites Other Than Evolve Securities

We recommend that customers review the privacy statement and policies of any online service prior to submitting personal information. If the event that ESI Web Site provides links to other Web Sites, whereby customers knowingly link to those other Web Sites, ESI has no control over and is not responsible for the gathering practices of other Web Sites.

Conditions of Use, Concerns

By choosing to visit and interact with ESI's Web Site, customers agree that their visit and any dispute regarding the protection of their privacy during such visit is subject to this Privacy Policy Statement. Please note that if customers enter into other contractual agreements with ESI, privacy terms and conditions of such other agreements may supplement or supersede this policy. Questions and concerns about privacy at ESI should be directed to compliance@evolvesec.com.

CONTACT US

Should questions concerning this privacy policy arise, please send us an email at compliance@evolvesec.com, specifying "Privacy Policy Statement" in the subject line.

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Thank you for your business!