

Your Privacy Is Important To Us

We value you as a customer and take your personal privacy seriously. We are committed to maintaining the confidentiality, integrity and security of your personal information. When you provide personal information, we believe that you should be aware of our policies to protect the confidentiality of that information. We will inform you of our policies for collecting, using, securing, and sharing nonpublic personal information the first time we do business and every year that you are our customer.

Information We May Collect:

We collect and use information we believe is necessary to open your account, to process your transactions, to advise you about our products and services, and to provide you with customer service. We may collect and maintain several types of information needed for these purposes from the following sources: Information we receive from you on applications or other forms; and Information about your transactions with us, our affiliates, or others.

How We Use Information About Our Customers

We think that our ability to share financial information within our company enables us to effectively serve our customers in several ways. By knowing about investors' finances and goals, we are better informed to make suitable investment recommendations. Information-sharing protects individuals against fraud by enabling us to more precisely monitor and detect where and when fraud may occur.

Protecting the Security and Confidentiality of Information

It is our policy to assure that the information we have about our customers is accurate. It is our policy that information we have about our customers is highly confidential and should only be available to persons who have a need for the information to properly service a customer's account, act upon a customer's request or to fulfill that person's job responsibility within our company. We restrict access to nonpublic personal information about you to those employees with a legitimate business need for the information. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Information Sharing

There are two types of information sharing--information sharing with our affiliates and information sharing outside Nicol. We do not sell customer information. We do not provide customer information or account numbers to persons or organizations outside Nicol who are doing business on our behalf for their own marketing purposes.

Information We May Share:

We are permitted by law to share nonpublic information about you with third parties for the following purposes: To complete a transaction. To produce a consolidated or non-consolidated account statement. To service your account. To cooperate with regulators or law enforcement authorities. To resolve customer disputes. In order to perform our responsibilities as listed above, we may be required to disclose to third parties the following kinds of nonpublic personal information about you: Information we receive from you on applications and other forms, such as your name, address, social security number, assets, net worth, income and tax status; and Information about your transactions with us, our affiliates, or others, such as your account size, payment history, parties to transactions, and trading frequency. In connection with potential business transfers, we may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, exchange, transfer, or acquisition of all or a portion of our business to another company.

Categories of Third Parties To Whom We May Provide Information:

Information we share about you may be disclosed to our affiliates, which include Kevin G. Nicol & Associates, Inc., a general insurance agency. Information may be shared with companies we hire to provide support services, such as carrying and executing broker/dealers, clearing firms, custodians, mutual fund distributors, portfolio managers, insurance companies, independent auditors and accountants. We may be required to disclose your nonpublic personal information to regulators or law enforcement authorities. Companies we hire to provide support services are required by us to protect, to keep confidential and to restrict the use of your nonpublic personal information. We do not disclose customer account numbers to any third parties for use in telemarketing, direct mail marketing, or other marketing through electronic mail to the consumer. In connection with potential business transfers, we will ensure the confidentiality of your information by requiring the counterparty to agree to only use your information for the business transfer purpose or otherwise as allowed by law.

Former Customers:

We may disclose nonpublic personal information about our former customers to the same extent as for our current customers.

How We Use Email

We will never send emails asking for personal or account information, such as passwords, Social Security number, PINs, credit or check card numbers. In most instances, we will not send you emails unless you have initiated an email dialogue with us; you have previously requested us to communicate with you in this manner; and/or the email is about your relationship with us.

Your Choice To Share Information:

The law permits us to share your identifying information and information about your transactions with nonaffiliated third parties for the purposes described above. We do not share your information with nonaffiliated third parties for any other reasons. Therefore, we are not providing an opt-out provision for information shared with nonaffiliated third parties. The law permits us to share your identifying information and information about your transactions with our affiliated parties. Unless you tell us not to, we may share other information with our affiliates, including information we receive from you on applications and other forms, or information we receive from a consumer reporting agency. If you prefer that we not share these kinds of information with our affiliates, you may direct us not to share this information by calling us at the following number: (618) 931-3267.