



## Privacy Policy

Updated: 04/15/08

### A Guide to How We Use and Protect Client Information

Your personal and financial data is private information. Whether you are an existing customer or considering a relationship with us, protecting your privacy is our priority. In compliance with new privacy regulations, Online Brokerage Services, Inc. (OBS) is required to provide you with an annual notice informing you of your rights as a customer/consumer and our obligations as it relates to federal privacy laws recently enacted under Regulation S-P to protect information you provide to us.

#### **INFORMATION ONLINE BROKERAGE SERVICES, INC. COLLECTS**

This personal information, not available publicly, may come from the following sources of information, which you may have provided us:

- Name and Address
- Social Security Number and/or Taxpayer Identification Number
- Assets
- Income
- Account Balance(s)
- Investment Activity
- Accounts at Other Institutions

#### **WHY ONLINE BROKERAGE SERVICES, INC. COLLECTS PRIVATE INFORMATION**

In order to provide you with the best financial services and products available, we need to evaluate your information for any strengths or weaknesses. Our decisions regarding financial products and decisions must be based on sound judgments made from all the information you may have provided us. It also helps us service your accounts and administer our business.

For example, we use information about you to:

- Respond more accurately and efficiently to your requests
- Identify opportunities to give you more convenience and control by developing products and services that may meet your objectives and benefit you
- Secure your accounts and help protect you and Online Brokerage Services, Inc. from fraud

#### **ONLINE BROKERAGE SERVICES, INC. WILL SAFEGUARD PERSONAL INFORMATION YOU PROVIDE**

You may rely on us to protect the personal and private information you have entrusted to us. Every precaution, in accordance with federal laws and regulations, is used to limit access to personal information about you to those employees who assist us in providing products and services to meet your needs. OBS maintains internal, physical, electronic, and procedural safeguards to protect personal information about you. Some of the steps we take to safeguard information you provide us include the following:

- Information is provided only to those who have a legitimate reason to know. Employees of our office are required to adhere to company policies and procedures protecting customers'/consumers' information.
- From time to time, we may disclose your information to affiliated offices in order to determine which products or services are best suited to your needs. Employees of such affiliated offices are required to follow our company's policies and procedures in safeguarding your privacy.
- We may also provide information to non-affiliated companies to assist us in providing beneficial products or services to you. In such a situation, we will provide only the information necessary for that assigned purpose to the non-affiliated company. Similar to our employees and those of our affiliated offices, we will require any non-affiliated office to follow company policies and procedures as well.
- In order to verify particular information, we may contact the appropriate third party for verification. For instance, we would not ask for medical information when deciding the issuance of annuities of group pension products.
- In accordance with any state or federal laws, we may be required to release information in certain circumstances (i.e. protection against fraud).
- Our company will maintain strict physical, electronic, and procedural measures to protect your information.
- By law, we are required to notify you of our privacy policy on an annual basis. Although we reserve the right to change our privacy policy, we will tell you of the changes promptly.

Most importantly, we want to assure you that we will not sell client information to anyone. Your rights as our customer/consumer are a priority to us.

#### **ONLINE BROKERAGE SERVICES, INC. LIMITS THE SHARING OF INFORMATION**

To protect your privacy, we limit the information we share both within and outside OBS. We conduct our business with great respect for the confidential nature of the information being provided. We will not share information about you, unless authorized by you, except as outlined below.

#### **SHARING INFORMATION WITHIN ONLINE BROKERAGE SERVICES, INC.**

The sharing of information within OBS allows us to provide you with complete and superior service. We may share with OBS the information described above in the section captioned "Information Online Brokerage Services, Inc. Collects." This includes information about your transactions or experiences with us, information you supply on your account applications, and information we receive from third parties.

You have the right to instruct us not to share certain information (other than information about our transactions and experiences with you) from your account applications or information we receive from third parties among affiliated financial service companies. If you do not want us to disclose this information about you, please contact us. Your request not to share this information will apply to all of your accounts with us, including any new accounts you open after your original request.

#### **ONLINE BROKERAGE SERVICES, INC. SHARES INFORMATION WITH COMPANIES WHO HELP PROVIDE SERVICES TO YOU**

OBS may share the information described under the section "Information Online Brokerage Services, Inc. Collects" with companies external to OBS to complete a transaction you have requested or to help us service your account. We may also share information with other financial institutions with which we have a joint marketing agreement. We are highly selective in choosing these companies. All companies with whom we do business are contractually obligated to comply with strict standards regarding security and

confidentiality, and the information can be used only for the sole purpose of providing the service we have requested the company to perform.

Examples of the type of outside companies with which we may share information include:

- Non-financial companies that perform services for us such as data processing, and companies that perform marketing services on our behalf
- Financial service providers, including mutual fund companies, insurance, and annuity companies

### **SHARING INFORMATION IN OTHER SITUATIONS**

OBS may share the information described under the section captioned "Information Online Brokerage Services, Inc. Collects" when we are permitted or required by law. Examples include responding to a subpoena, conducting a fraud investigation, or reporting to a credit bureau. We may also share this information when authorized by you.

### **AN ONGOING COMMITMENT TO YOUR PRIVACY**

We are just as committed to protecting the privacy of our former customers, as we are our current customers. If you choose to close your account or become an inactive customer, you will continue to be protected by the privacy guidelines and principles described in this policy.

### **THANK YOU!**

At OBS your business is important to us, and we promise to do our best to safeguard your financial assets and personal and financial information. If at any time we can help you further, please contact us.