#### INVSTR+ ADVISORY PRIVACY STATEMENT

THIS PRIVACY STATEMENT MUST BE READ IN CONJUNCTION WITH INVSTR'S PRIVACY POLICY WHICH YOU HAVE ALREADY ACCEPTED AND CAN BE REVIEWED HERE

#### What You Should Know

Invstr Financial LLC ("We" or "Us"), an affiliate of Invstr Limited, recognizes the importance of keeping information about you secure and confidential. We do not sell or share your nonpublic personal and financial information with marketers or others outside our affiliated group of companies.

We carefully manage information among our affiliated group of companies to safeguard your privacy and to provide you with consistently excellent services.

We provide this notice to you in order to comply with the requirements of Regulation S-P, "*Privacy of Consumer Financial Information*," issued by the United States Securities and Exchange Commission.

# **Our Privacy Policy**

We are committed to protecting the non-public personal and financial information of our customers and consumers who obtain or seek to obtain financial products or services primarily for personal, family or household purposes. We fulfil our commitment by establishing and implementing policies and systems to protect the security and confidentiality of this information.

In the offices, We limit access to your nonpublic personal and financial information to personnel who need to know the information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal and financial information.

#### **Categories of Information the Firm Collects**

We may collect the following types of nonpublic personal and financial information about you from the following sources:

- Your name, address and identifying numbers, and other personal and financial information, from you and from information and documentation you submit to Us, on applications, agreements or other forms or communications.
- Information about your account balances and financial transactions with Us or nonaffiliated third parties, from our internal sources, from affiliated entities and from nonaffiliated third parties.
- Information about your account balances and financial transactions and other personal and financial information, from consumer credit reporting agencies or other nonaffiliated third parties, to verify information received from you or others.

### **Categories of Information We Disclose to Non-Affiliated Third Parties**

We may disclose your name, address and account and other identifying numbers, as well as information about your pending or past transactions and other personal financial information, to nonaffiliated third parties as necessary to administer and service you [or to market Our products and services through joint marketing arrangements].

We may disclose non-public personal and financial information concerning you to law enforcement agencies, federal regulatory agencies, self-regulatory organizations or other nonaffiliated third parties, if required or requested to do so by a court order, judicial subpoena or regulatory inquiry.

We do not otherwise disclose your nonpublic personal and financial information to nonaffiliated third parties except in the limited circumstances described above, unless We believe in good faith that disclosure is required or permitted by law. Because We do not disclose your nonpublic personal and financial information to nonaffiliated third parties, Our Privacy Policy does not contain opt-out provisions.

## **Categories of Information the Firm Discloses to Affiliated Entities**

We may disclose your name, address and account and other identifying numbers, account balances, information about your pending or past transactions and other personal financial information to our affiliated entities for any purpose.

We regularly disclose names, addresses and accounts and other identifying numbers, account balances and information about pending or past transactions to our affiliates to administer and service you or to market our products and services to such clients.

#### **Information About Former Customers**

We do not disclose non-public personal and financial information about former customers to nonaffiliated third parties unless required or requested to do so by a court order, judicial subpoena or regulatory inquiry, or otherwise where We believe in good faith that disclosure is required or permitted by law.

# Questions