

INDEPENDENT [ FINANCIAL ] PARTNERS

## PRIVACY POLICY

# PRIVACY POLICY

This Privacy Policy notice is provided to you on behalf of Independent Financial Partners (“IFP”). This notice has been prepared to describe to you what IFP collects, and how IFP collects, handles, and safeguards your personal information. Please read this notice carefully to understand your privacy rights.

| Facts | What Does Independent Financial Partners Do with Your Personal Information?  |
|-------|--|
| Why?  | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all sharing of their personal information. Federal law also requires IFP to tell you how it collects, shares, and protects your personal information. IFP’s Privacy Policy tells you how we collect, share and protect your personal information and provides you with an opportunity to opt out of sharing in certain circumstances as described below. |
| What? | <p>The types of personal information we collect can include:</p> <ul style="list-style-type: none"> <li>• Name, Address, Social Security number and Date of Birth</li> <li>• Income, Assets, Net Worth and Investment Experience</li> <li>• Account Balances and Transaction History</li> </ul> <p>When you are no longer our customer, IFP will continue to maintain your personal information and share it as described below in this notice.</p>  |
| How?  | All financial companies need to share their customers’ personal information to conduct their daily business. In the section below, IFP lists what it does share and the reasons for sharing your personal information, and whether you can limit this sharing.   |

| Reasons We Can Share Your Personal Information*  | Does IFP share? | Can you limit this sharing? |
|--|-----------------|-----------------------------|
| For our business purposes, including to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes             | No                          |
| For our marketing purposes to offer our products and services to you   | Yes             | No                          |
| For joint marketing with other financial companies   | Yes             | No                          |
| For our affiliates to market products and services to you  | No              | No                          |
| For our affiliates’ business purposes – information about your creditworthiness  | No              | No                          |
| For non-affiliates to market to you and/or to conduct their business   | No              | No                          |

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| What We Do   |  |
|--|--|
| How does IFP protect my personal information?                              | To protect your personal information from unauthorized access and use, IFP uses security measures that comply with federal law. IFP has implemented security standards and processes as well as physical, electronic and procedural safeguards – including training and confidentiality agreements - designed to protect your personal information.  |
| How does IFP collect my personal information?                              | <p>IFP collects your personal information when you:</p> <ul style="list-style-type: none"> <li>• Sign an investment advisory agreement to permit your Advisor to manage your assets</li> <li>• Open an account with your Advisor through IFP</li> <li>• Provide information to your Advisor about details of your accounts, investments or retirement assets</li> <li>• Execute investment transactions in your account</li> </ul> <p>IFP also collects your personal information from others such as credit bureaus, affiliates, or other companies.</p>  |
| Why can't I limit all sharing?   | <p>Why can't I limit all sharing?</p> <p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>• Sharing for affiliates' business purposes—information about your creditworthiness</li> <li>• Affiliates from using your information to market products and services to you</li> <li>• Sharing for nonaffiliates to market products and services to you</li> </ul> <p><b>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</b></p>   |
| How does IFP treat my personal information once I am no longer a customer? | <p>The firm will provide personal information about former customers only if required to do so by law or regulation or to those parties who need such information in order for IFP to carry out any continued obligation with respect to the services provided from its relationship with you.</p> <p>If your independent representative terminates his or her relationship with us and moves to another brokerage or investment advisory firm, we or your independent representative may disclose your personal information to the new firm, unless you instruct us otherwise by returning the completed Privacy Choices Notice form attached to this notice.</p> <p><b>*For customers in Alaska, California, Massachusetts, Maine, New Mexico, North Dakota, Minnesota and Vermont please see below.</b></p> |

# PRIVACY POLICY

| Definitions     |  |
|-----------------|--|
| Affiliates      | Companies related by common ownership or control. They can be financial and nonfinancial. companies  |
| Nonaffiliates   | Companies not related by common ownership or control. They can be financial and nonfinancial. companies.   |
| Joint marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you:<br><br>This may include banks, credit unions, or other financial institutions with which IFP has a joint marketing agreement. |

| Important Information   |  |  |
|---|--|--|
| <p><b>Information for Alaska Customers</b></p> <p>In response to Alaska law, if your financial advisor terminates his or her relationship with IFP and transfers to another brokerage or investment advisory firm and your primary address is in Alaska, you must give your written consent before IFP will allow your financial advisor to take any of your personal information to his or her new brokerage or investment advisory firm.</p> <p><b>Information for California Customers</b></p> <p>In response to California law, IFP automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to nonaffiliated third parties except as permitted by the applicable California law..</p> | <p><b>Information for Massachusetts Customers</b></p> <p>IFP shall implement and maintain a comprehensive information security program which contains administrative, technical and physical safeguards that are appropriate to safeguard the Confidential Information it receives from its clients and which are consistent with any applicable federal and/or state statutes or regulations.</p> <p><b>Information for Maine Customers</b></p> <p>For further information, please contact the state at (207) 624-8551.</p> <p><b>Information for New Mexico Customers</b></p> <p>For further information, please contact the state at (505) 476-4580</p> | <p><b>Information for North Dakota Customers</b></p> <p>For further information, please contact the state at (701) 328-2910.</p> <p><b>State of Minnesota Customers</b></p> <p>For further information, please contact the state at (651) 539-1638</p> <p><b>Information for Vermont Customers</b></p> <p>In response to a Vermont regulation, if we disclose personal information about you to nonaffiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.</p> |

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## MAIL-IN FORM

### Privacy Choices Notice

(To be used by clients of Independent Financial Partners)

If you would like to limit the personal information that your Advisor could disclose or take if he or she terminates with IFP and transfers to another investment firm, please complete and mail the following form to:

Compliance Department  
Independent Financial Partners  
3030 N. Rocky Point Dr. W., Suite 700  
Tampa, FL 33607

You can withdraw your opt-out choice at any time by contacting IFP in writing at the address above.

If your primary address is in a state that requires your affirmative consent to share your personal information in the states named above, then you must give your written consent before your Advisor may take any of your personal information to his or her new firm.

- Limit the personal information about me that my financial advisor could disclose or take if he or she terminates with IFP and transfers to another investment firm. You understand that Independent Financial Partners may disclose your name, address, telephone number, email and the account title of the accounts serviced by your Advisor to his or her new firm as allowed under federal and certain state laws.

Advisor's Name

Please note that for accounts held jointly by two or more persons, the privacy choices made by any account holder apply to all joint holders with respect to the account. **In order for your opt-out election to be effective, you must complete ALL of the following information:**

### CUSTOMER 1:

Name

Address

City

State

ZIP

Phone Number

Account or SSN

Signature

Date

# PRIVACY POLICY

## CUSTOMER 2:

Name

Address

City

State

ZIP

Phone Number

Account or SSN

\_\_\_\_\_  
Signature

Date