

## **Privacy Policy of Collins Stewart LLC**

Collins Stewart LLC is concerned with our clients' privacy. As a Broker/Dealer and Registered Investment Adviser, we are required to gather information about our clients from applications, transactions, interactive discussions, and from time to time, banking references or consumer reporting agencies. We have adopted the following policies regarding this information:

We do not disclose non-public personal information about our clients or former clients to third parties other than as described below.

- We use the information we gather to provide services to you, to open an account for you, process transactions for your account or otherwise in furtherance of our business services to you.
- In order to provide service to your account or effect your transaction, we may provide your personal information to our affiliates and to firms that assist us in servicing your account and have a need for such information, such as our clearing broker.
- In order to service your account we may provide your personal information to third party service providers or financial institutions. However, if such institutions or vendors are used, we disclose information to them only for the particular business purpose of servicing your accounts and we endeavor to insure that such institutions or vendors do not disclose such confidential information.
- We restrict access to non-public personal information about you to our employees. Only employees who provide products or services to you will have access to personal information. We maintain physical, electronic, and procedural safeguards and comply with Federal standards to guard your personal information.
- We may share the personal information that we collect about our customers, prospects, or former customers with Government agencies, other regulatory bodies, and law enforcement officials (for example, the purpose of reporting suspicious transactions and/or fraud prevention).
- We do not otherwise provide information about you to outside firms, organizations, or individuals, except our attorneys, accountants, and auditors, and as permitted by law. This also applies if you should decide to close your account. We would continue to adhere to the privacy policies and practices as described herein.
- Privacy, security and service in our online operations are just as critical as in the rest of our business. We therefore employ all of the safeguards described above, along with the following Internet-specific practices. To maintain the security of your online session, we make extensive use of firewall barriers, encryption technique, and authentication procedures. We may place cookies and similar files on your hard drive for security purposes to facilitate site navigation and to personalize your experience on our site. We may also collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web site. This information may be used to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

As required by Federal Law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time. However, if such changes occur, we will notify you promptly.