

Privacy Policy

The Firm, either itself or through an affiliated party, will provide upon opening a new account each consumer/client with a copy of its privacy policy. The Firm may choose to use various avenues of distribution including but not limited to the incorporation of its privacy policy into its new account application, delivery through e-mail, or by mailing it. The privacy policy is to be provided to the consumer/client at or prior to them becoming a consumer/client of the Firm or upon any amendments to the Firm's privacy policy. Delivery depends on the wishes of the consumer/customer.

Sharing Financial Information.

The Firm will provide written notice to their consumers/customers of any sharing the Firm may do with its consumer/customer's financial information with any of the firm's affiliates and affiliated parties unless the consumer/client chooses to opt out of the information sharing arrangement.

Safeguarding Financial Information.

The Firm, either itself or through an affiliated party will take the necessary steps to safeguard the consumer's/customer's financial information by means applicable to the avenue that the firm has received such information. The Firm will ensure such information is secure by providing a location that is secure and accessible to authorized personnel only, or by securing internet sites through SSL if the consume/client provides such financial information through the internet.

The Firm through its CCO will monitor the access of such information by authorized personnel only; by reviewing any applicable firm agreements to ensure that such agreements adhere to the policy and that no dissemination of such information is being generated without the prior consent of the Firm, the Firm's consumer/customer, and also by ensuring the firm's internet access (if applicable) is secured by establishment of fire wall protection and/or other security measures.