

Securities Service Network, LLC Information Notice for California Residents

What Is This Notice?

The California legislature recently enacted the California Consumer Privacy Act of 2018 (“CCPA”)—a law that relates to personal information about California residents. This Notice is provided on behalf of Securities Service Network, LLC and our affiliate, SSN Advisory Inc. (collectively “SSN”) to advise you of types of personal information that SSN may collect about you that may be covered by the CCPA and the purposes for which we collect such information.

We are providing this notice broadly to California residents as a courtesy, and in light of the CCPA’s new requirements. However, only limited personal information SSN collects is covered by the CCPA in light of our business and the Act’s exceptions. For instance, information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act and implementing regulations, and the California Financial Information Privacy Act, is exempted from nearly all provisions of the CCPA, including the rights of access, deletion, and opt out. As a general matter, those laws apply to nonpublic personal information about individuals who obtain financial products or services from us primarily for personal, family, or household purposes.

Information We Collect and How We Use the Information

We may collect the following categories of personal information that may be covered by the CCPA and use it for the following purposes:

Types of Personal Information:

- ***Contact information and other personal identifiers***, such as name, postal address, email address, phone number, unique personal identifier, account name, registration numbers, tax identification number, Social Security number, passport number, and other similar identifiers
- ***Commercial and financial information***, such as records of personal property or financial accounts, products or services, other purchasing or consuming histories or tendencies, information on investments, investment objectives, risk tolerance, time horizon, assets, income, expenses, net worth, tax status, holdings, account balances, transaction history, investment experience
- ***Internet or electronic activity information and device and online identifiers***, such as IP address, online identifier or device IDs, or other similar identifiers, information regarding interaction with a website or application, browsing history, calls and emails sent and received
- ***Professional or educational information***, such as information about your employment and background
- ***Demographic and family information***, such as date of birth, sex, marital status, such as whether a client is related to someone who is employed in the securities industry, information about related parties to an account, dependants, and beneficiaries, citizenship
- ***Audio and visual information***, such as photographs, CCTV recordings, voicemail, or other telephone recordings (e.g., for our support lines)

- **Professional**, such as information about your employment or businesses
- **Other information you make available to us**, such as in an email or phone call
- **Inferences** drawn from personal information to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance

Our Uses of Personal Information

- Offering and providing products and services, including opening accounts, communicating with you, providing investment recommendations, making suitability determinations, marketing our products and services to you, and connecting you with other products and services
- Operating our business, including ensuring the security and sufficiency of our networks, systems, products, services, applications, facilities; improving our products and services; managing risk; and securing accounts, property, and resources
- Complying with applicable regulatory and legal requirements (for example, client identification program, and know your customer requirements); protecting our rights, property, and the safety of our employees or others; responding to lawful requests; and other legitimate business and commercial purposes (including in connection with a sale, merger or consolidation, or other transfer of assets)

Where To Find More Information

If you are a SSN client, you will also receive our *Privacy Notice*, as required by federal law, which provides information about how we collect, share, and protect your personal information and provides information about opting out of such sharing.

Please note that you may interact with a representative, other financial institutions, or other third parties (sometimes referred to as non-affiliates), and direct us to share information with such third parties as we provide products or services to you. SSN may not control the data practices of such third parties, and we recommend you review any applicable third party privacy policies for information about their data practices.

Accessibility

We are committed to ensuring the accessibility of our communications to individuals with disabilities. To make a request or report a concern, please contact us at 800-264-5499 or ccpa@ssnetwork.com.

How To Contact Us

If you have any questions, please contact us at: 9729 Cogdill Rd. Suite 301, Knoxville, TN 37932 or 800-264-5499 or ccpa@ssnetwork.com.