A Pacific Northwest



Martin Nelson & Co., Inc. Privacy Policy

At Martin Nelson & Co, Inc. (MNCO), we are committed to protecting your privacy and the confidentiality of your personal and financial information. The measures we take to keep your personal information private and secure are outlined below.

How We Protect Confidentiality

MNCO uses procedural, physical and electronic system safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities.

When we enter into agreements with other companies to provide services to us or to make products and services available to you, we include a confidentiality clause. Under such an agreement, these companies may receive information about you, but they may only use it for the intended purpose - to benefit you.

Persons Covered by the Privacy Policy

The MNCO Privacy Policy applies to anyone who is a current or former MNCO brokerage client. We provide you with a copy of this policy when you open an account, and you can review it on our website <u>www.martinnelsonco.com</u> thereafter. If we change our policy regarding the sharing of information, we will notify you in advance and give you the opportunity to "opt out" of such disclosure.

How We Obtain Information About You

In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as non-public personal information, may be collected from several sources, including: applications and other forms you file with us (e.g., name, assets, income), records of transactions with us, our affiliates, non-affiliated third parties and others (e.g., credit report). Because we strive to provide you with the best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact your account representative or MNCO directly if you need to correct or update your personal information.

Sharing Information-With Whom and Why

MNCO and your custodian, (Charles Schwab or Hilltop Securities) do not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial service choices.

We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies:

We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s). Examples include, but are not limited to, the company that prints and mails your account statement, our internal customer relationship management software and our billing and trading provider.

We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with securities regulators or law enforcement authorities, to resolve consumer disputes, or to perform credit evaluations and authenticate checks.

Charles Schwab and HillTop Securities, Inc. have multiple affiliates and may share information with those affiliates. For Schwab clients, please review the Charles Schwab Privacy Policy, which is send to you by Charles Schwab annually. For HillTop clients, please review the Hilltop Securities, Inc. Privacy Policy, which is send to you by HT annually.

For your reference, this policy has been posted to our Web site at www.martinnelsonco.com. If you have questions or concerns, please contact us at 206-682-6261.

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Martin Nelson & Co., Inc. 1500 Westlake Ave. N. # 200 Seattle, WA 98109

(206) 682-6261 www.martinnnelsonco.com