

# Customer Privacy Information



Securities  
America

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Securities America, Inc. • Member FINRA/SIPC • 2011  
Securities America Advisors, Inc. • An SEC Registered Investment Advisory Firm

## CUSTOMER PRIVACY NOTICE

This Privacy Notice is from Securities America, Inc. ("SAI"), Securities America Advisors, Inc. ("SAA") and Brecek and Young Advisors ("BYA") dba Iron Point Capital Management. SAI is a broker-dealer and insurance agency and is in the business of providing brokerage services and insurance products to customers. Both SAA and BYA are investment advisors and are in the business of providing financial planning and investment advisory services to customers. In this Notice, SAI, SAA and BYA may be collectively referred to as the "Securities America Companies."

SAI, SAA and BYA are owned by Securities America Financial Corporation. While each of the Securities America Companies operates as a separate company, SAI, SAA and BYA share personnel and facilities to provide coordinated administrative and support services for clients. The Securities America Companies are committed to safeguarding your confidential information. Except as is described in this Notice and as may be required or permitted by law, the Securities America Companies do not share your Customer Information with nonaffiliated third parties.

### CUSTOMER INFORMATION WE COLLECT

SAI, SAA and BYA collect and develop personal information about you. The term "Customer Information" means any type of personally identifiable information provided by you or gathered about you that is not generally publicly known. The essential purpose for collecting Customer Information is to provide and support the financial products and services you obtain from the Securities America Companies. The categories of Customer Information collected by the Securities America Companies depend upon the scope of the engagement with your Securities America Investment Representative, and are generally described below.

As a broker-dealer and insurance agency, SAI collects and develops Customer Information in order to provide brokerage and insurance products and services. SAI collects Customer Information such as:

- Information we receive from you on applications or other forms such as your name, address, Social Security number, income, income tax rate, net worth, financial objectives, risk tolerance and the names of beneficiaries.
- Information we receive or obtain from other sources, including:
  - > Information collected and developed by issuers of securities, insurance products or services you own, in order to issue, administer and process transactions relating to these products or services.
  - > Information about your creditworthiness and credit history that we may obtain from unaffiliated consumer reporting agencies.
  - > Information about your financial products and services transactions with SAA.
- If you apply for insurance products through SAI, we may collect health information that you provide to us.

As a financial planner and an investment advisor, SAA and BYA collect and develop Customer Information about you in order to provide investment advisory services. Customer Information SAA collects includes:

- Information the Securities America Companies receive from you on financial inventories through consultation with your SAA or BYA Representative. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about your financial products and services transactions with SAI.

### DATA SECURITY

The Securities America Companies restrict access to Customer Information to our Representatives and employees who need the information to perform their job responsibilities. The Securities America Companies maintain agreements, as well as physical, electronic and procedural security measures that comply with federal regulations to safeguard your Customer Information.

### DISCLOSURE OF CUSTOMER INFORMATION TO AFFILIATES FOR MARKETING PURPOSES

The Securities America Companies do not share Customer Information with affiliated companies for marketing purposes.

### USE AND DISCLOSURE OF CUSTOMER INFORMATION TO PROVIDE CUSTOMER SERVICE FOR YOUR ACCOUNTS

To administer, manage and service customer accounts, process transactions and provide related services for your accounts, it is necessary for us to provide access to Customer Information within the Securities America Companies and to certain nonaffiliated companies. We may share Customer Information we gather with:

- Independent registered investment advisor firms and insurance agencies affiliated with your Representative.
- Parent and affiliated companies of the Securities America companies.
- Entities that perform services for us or function on our behalf (such as check printing services, clearing broker-dealers, investment companies, and insurance companies).
- Third-party administrators and vendors for the purposes of providing current and future information on your account (such as transaction history, tax information and performance reporting).
- Companies that market services on our behalf, or financial institutions with whom we have entered into a joint marketing or networking agreement in order to provide you with valuable financial products or services.

- Others as permitted or required by law (such as to government entities, consumer reporting agencies or other third parties in response to subpoenas).
- Other organizations, with your consent.

## **DISCLOSURE OF YOUR CUSTOMER INFORMATION**

- The Securities America Companies recognize the right of each customer to select a representative (or advisor) to provide brokerage, investment advisory and insurance products and services. In connection with the transfer of your representative's securities or advisory registration to another firm, your Customer Information may be shared with your representative's new firm. Similarly, if your account was opened with us because of your relationship with a financial institution, such as a bank, thrift or credit union, and your financial institution decides to enter into a relationship with a new firm to provide investments, we will share your Customer Information with your financial institution so your account can continue to be serviced at your financial institution. The information to be shared may include Confidential Information in the custody of your representative or your financial institution, as well as other information in our possession or in the possession of certain nonaffiliated third parties who perform services for your account that we believe are necessary to transfer your account. Such Customer Information can include your address, telephone number, email address, account number and type, transaction history, tax reporting information, and other information relating to your account.
- Your Customer Information may also be shared with certain entities that are owned, controlled by or affiliated with your Representative.
- In addition, in the event your representative (or his/her estate) agrees with an unaffiliated representative to sell all or some portion of his/her securities, advisory or insurance business, your confidential Customer Information may be shared with the acquiring representative and his/her firm.

- You may prevent disclosure of your Customer Information by instructing the Securities America Companies not to provide your Customer Information in these instances by calling Securities America at 800-747-6111 and pressing "1" to be directed to the Regional Rep Relations Team. You may prevent this disclosure now or at any later time. In addition, you may call this same number to revoke or withdraw your instruction to not share your Customer Information.

## **USE AND DISCLOSURE OF HEALTH INFORMATION**

To the extent you provide health information to SAI or BYA for the purpose of making application for insurance products, such information will not be disclosed to nonaffiliated companies for any purpose, except:

- to underwrite or administer your insurance policy or related claims;
- as required by law; or
- as authorized by you.

## **FORMER CLIENTS**

If you close an account with the Securities America Companies, we will continue to operate in accordance with the principles stated in this Notice.

## **REQUIREMENTS OF FEDERAL LAW**

In November 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). GLBA requires financial institutions, including broker-dealers, investment advisers and investment companies to adopt policies and procedures designed to protect the privacy of Customer Information. To the extent a financial institution discloses Customer Information to nonaffiliated third parties other than as permitted or required by law, customers must be given the opportunity and means to opt out (or, prevent) such disclosure.

## **REQUIREMENTS OF STATE LAW**

If you live in a state which requires the Securities America Companies to obtain your affirmative consent to authorize sharing your Customer Information, we will seek your written instruction to authorize disclosure of your confidential Customer Information before that data is shared. The current states requiring such written consent are:

- > California
- > Maine
- > Massachusetts
- > New Mexico
- > North Dakota
- > Vermont

## **KEEPING UP TO DATE WITH OUR PRIVACY NOTICE**

We may make changes to this policy at any time and will inform you of changes, as required by law. To receive the most up-to-date Privacy Notice, you can visit our website at [www.securitiesamerica.com](http://www.securitiesamerica.com) (under the Investors>Investor Information section) or call us at (800) 747-6111.

