

Vontobel Securities PRIVACY PRACTICES NOTICE

Vontobel Securities is committed to protecting the privacy of our customers and former customers. In order to issue and service high quality financial products and services, we collect personal information about you. We do not sell the information you have entrusted to us to third parties, and we disclose your personal information only as necessary to provide the products and services you expect from a financial services leader. To help you understand how we protect your personal information, this notice describes our current privacy policy and practices. During the continuation of your relationship with Vontobel Securities, we will advise you of our privacy policy and practices at least once annually, as required by law.

You do not need to take any action as a result of this notice, but you do have certain rights as described below.

INFORMATION WE MAY COLLECT AND USE

We collect information about you, which we may share now or in the future. We do this to help us identify you as our customer or our former customer, to process your transactions and requests quickly, to provide investment services to you or tell you about products or services we believe you may want and use.

Information we collect includes:

- Information from you – When submitting your application, new account form, you may give us information such as your name, address, Social Security number, financial, and employment history.
- Information about your transactions – We may keep information about your transactions with our company, for example, the products you purchase from us, your account balances, or payment history.
- Information from outside our company – We may also collect other information that may include information from consumer reporting agencies such as your credit history, credit scores, or employment records. It may also include information from other individuals or businesses.

We do not collect medical or health information in connection with securities business.

HOW WE TREAT YOUR INFORMATION

Vontobel Securities may share the information described above with our service providers. These providers may require access to information about you to process or service transactions you have requested, to provide efficient customer services, or to inform you of our products or services you may find useful. Our service providers may be affiliated or unaffiliated, and may include financial service providers (for example, third party administrators, broker-dealers, and brokers, or registered representatives) or non-financial companies and individuals (for example, consultants and vendors.). Please be assured that we require these service providers to safeguard your

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personal information and to use or disclose it only for the work they are performing on our behalf, or as permitted by law.

We may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or to others when we believe in good faith that the law requires it. In the event of a sale of all or part of one of our businesses, we may share customer information related to that business as part of the transaction. Unlike many other financial institutions, Firm Name does not sell or share your information with marketers outside our company who may want to offer you their own products and services. Neither do we share information we receive about you from a consumer-reporting agency. You do not need to take any action for this benefit.

SECURITY OF INFORMATION

Keeping your information secure is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect your information. Employees are authorized to access your information only when they need it to provide you with products and services or to maintain your accounts.

MAKING SURE INFORMATION IS ACCURATE

We want to make sure that we have accurate information about you. Generally, upon written request, we will make your personal information available for your review. Information we have collected in connection with or in anticipation of a claim or legal proceeding will not be made available. If you believe that any of our records are inaccurate, you may notify us in writing of any corrections, amendments or deletions that you believe should be made. Questions about accessing or correcting your personal information should be directed to Vontobel Securities 1540 Broadway, NY, NY 10036 Attn: Kathy Gurczynski or send notice via email to compliance@vonsec.com. Please describe the information you wish to see or corrections required.