

J.W. Cole Financial Privacy Policy

J.W. Cole Financial values you as a customer and takes your personal privacy seriously. We are committed to maintaining the confidentiality, integrity and security of your personal information. When you provide personal information, please be aware of our policies to protect the confidentiality of that information. We will inform you of our policies for collecting, using, securing, and sharing nonpublic personal information the first time we do business, and every calendar year that you are our customer.

We collect and use information that is necessary to open your account, process your transactions, advise you about our products and services, and provide you with full customer service. We may collect and maintain several types of information needed for these purposes from the following sources:

- Information we receive from you on applications or other forms; and
- Information about your transactions with our affiliates, others, or us.

It is our policy to assure that the information we have about our customers is accurate. That information is highly confidential and is only made available to persons who have a need for the information to properly service a customer's account, act upon a customer's request or to fulfill that person's job responsibility within our company. We restrict access to nonpublic personal information about you to those employees with a legitimate business need for the information. We maintain physical, electronic, and procedural safeguards that comply with federal standards and standard industry practices to guard your nonpublic personal information.

There are two types of information sharing--information sharing with our affiliates and information sharing outside J.W. Cole Financial. We do not sell customer information. We do not provide customer information or account numbers to persons or organizations outside J.W. Cole who are doing business on our behalf for their own marketing purposes.

We are permitted by law to share nonpublic information about you with third parties for the following purposes:

- To complete a transaction.
- To produce a consolidated or non-consolidated account statement.
- To service your account.
- To cooperate with regulators or law enforcement authorities.
- To resolve customer disputes.

In order to perform our responsibilities as listed above, we may be required to disclose to third parties the following kinds of nonpublic personal information about you:

- Information we receive from you on applications and other forms, such as your name, address, social security number, assets, net worth, income and tax status; and
- Information about your transactions with our affiliates, others, or us such as your account size, payment history, parties to transactions, and trading frequency.

Information we share about you may be disclosed to our affiliates or companies we hire to provide support services, such as carrying and executing broker/dealers, clearing firms, custodians, mutual fund distributors, portfolio managers, insurance companies, independent auditors and accountants. We may be required to disclose your nonpublic personal information to regulators, subject to subpoena, or law enforcement authorities.

Should your J.W. Cole Registered Representative move to another brokerage firm, the Representative is permitted to retain copies of documents, in whatever form, (including electronic form), containing personal information about you so that he or she can assist with the transfer of your account and continue to serve you at their new firm. This policy is subject to the limitations of applicable state and federal law. Should your state be an "opt in" state, we will require your affirmative consent prior to this document or information retention.

Companies we engage to provide support services are required to protect, keep confidential and to restrict the use of your nonpublic personal information. We do not disclose customer account numbers to any third parties for use in telemarketing, direct mail marketing, or other marketing through electronic mail to the consumer.

J.W. Cole Financial may disclose nonpublic personal information about our former customers to the same extent as for our current customers.

The law permits us to share your identifying information and information about your transactions with nonaffiliated third parties for the purposes described above. We do not share your information with nonaffiliated third parties for any other reasons. Therefore, we are not providing an opt-out provision for information shared with nonaffiliated third parties.

The law permits us to share your identifying information and information about your transactions with our affiliated parties. Unless you tell us contrary, we may share other information with our affiliates, including information we receive from you on applications and other forms, or information we receive from a consumer reporting agency. If you prefer that we not share these kinds of information with our affiliates, you may direct us not to share this information by calling us at the following toll-free number: (866) 592-6531.

Securities Investor Protection Corporation (SIPC®)

In accordance with the FINRA Conduct Rule 2342, regarding SIPC information, please know that you may contact SIPC for additional information at (202)371-8300 or visit them on the Web at www.sipc.org. For an informational brochure on SIPC titled "How SIPC Protects You", please visit <http://www.sipc.org/how/brochure.cfm>.