

This Privacy Policy is provided to you on behalf of H.D. Vest, Inc. d/b/a HD Vest Financial Services and its affiliates (collectively, "HD Vest" or "we" or "us" or "our"). This policy applies to consumers who have, or have had, a customer relationship with one or more HD Vest affiliates including HD Vest Investment ServicesSM, HD Vest Advisory ServicesSM, or H.D. Vest Insurance Agency, LLC. For purposes of this policy, "Personal Information" is data specifically about you, which you typically provide to HD Vest on a voluntary basis when you purchase products or services through us or our sales representatives ("Advisors"). Personal Information does not include aggregate or combined information, which includes data related to you but does not identify you specifically.

Financial companies choose how they share your Personal Information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires HD Vest to tell you how we collect, share, and protect your Personal Information. The types of Personal Information we collect and share depends on the product or service you obtain through us.

Information Collection

HD Vest collects and maintains certain information about you, including Personal Information, in connection with opening and servicing your account, offering you products and services, and complying with applicable supervisory and record keeping regulatory requirements. In the course of serving you, we collect certain Personal Information about you from a variety of sources, such as:

- **Information you voluntarily provide to us through electronic communications (including email), on applications or forms, and through our websites, including, but not limited to,** your name, address, Social Security number, birth date, assets, income, email address, and/or health information (if you apply for insurance products through HD Vest). We may also collect information from your tax return if you voluntarily agree with your tax preparer to share that information with us.;
- **Information we receive from an outside company,** such as a credit bureau regarding your credit history if you apply for credit products, or due diligence companies to confirm your identity, background and/or eligibility to open an account; or
- **Information about your transactions or communications** with HD Vest, including electronic communications you have with HD Vest or our Advisors through all email accounts, including, but not limited to, an Advisor's HD Vest email address.

Information Use and Disclosure

How we share information about you within HD Vest

The Personal Information we collect is used to maintain and service your accounts. You cannot limit the sharing of Personal Information in this category. Personal Information may be used or shared within HD Vest for a number of purposes, such as:

- **For our everyday business purposes** such as to process your transactions, maintain and service your account, provide you with customer service, and protect your account. This includes sharing information if your accounts are reassigned to another HD Vest Advisor.
- **For marketing purposes** to offer products and services to you.

How we share information about you with Nonaffiliates

We share Personal Information with nonaffiliates in connection with servicing your account or otherwise as permitted or required by law. You cannot limit the sharing of Personal Information for the purposes described below.

- **Companies that perform services for us or assist us in servicing your account.** For example, First Clearing, LLC (HD Vest's clearing firm), data processors, technical systems consultants and computer programmers, check printers, data aggregators, marketers, mail fulfillment vendors and insurance policy underwriting, administration, and claims handling;
- **Others as permitted or required by law.** For example, responding to court orders, subpoenas, regulatory inquiries and legal investigations, reporting to credit bureaus, and those with whom you have requested or authorized us to share information;
- **In connection with an acquisition, merger, restructuring, sale or other transfer** of all or any portion of HD Vest we may share Personal Information with the purchaser or potential purchaser.
- HD Vest does not sell your Personal Information to nonaffiliates for those companies to market their own products or services to you.

Information You Share With Others

Account owners may choose to share their Personal Information or account-related information with individuals who are not account owners. For accounts held jointly by two or more persons, the privacy choices made by any account holder apply to everyone on your account. This applies, but is not limited to, Personal Information and account-related information provided to an account owner in paper or electronic formats.

Information Your Advisor Obtains

Your Advisor will obtain Personal Information about you during the course of servicing your accounts while he or she is affiliated with HD Vest, and may retain that information after leaving HD Vest. That information remains subject to restrictions that limit the use or disclosure of the information (except as permitted or required by law). If your Advisor joins a nonaffiliated securities broker-dealer, investment adviser or insurance company, we or your Advisor may share your Personal Information with the new firm to enable your Advisor to notify you of his or her new firm and as a means to continue servicing and maintaining your accounts.

You can limit the Personal Information an Advisor retains or shares with a new firm, or we share with a new firm, by following the instructions provided below (HD Vest can only limit this sharing if we receive your instructions in a timely manner before the Advisor has terminated his or her affiliation with HD Vest).

HD Vest Advisors are independent contractors affiliated with HD Vest solely for the purpose of conducting securities-related activities offered through HD Vest. If your HD Vest Advisor offers you other products or services not affiliated with HD Vest (e.g., legal, tax, accounting, audit, payroll), then any Personal Information you provide unrelated to HD Vest products and services is not covered by this privacy policy and your rights (including the right to limit what the Advisor retains after leaving HD Vest) would instead be governed by the laws and rules covering that particular product or service and the Advisor’s independent business privacy policy.

Information Protection

To protect your personal information from unauthorized access and use, we use security measures designed to comply with federal law. These measures include computer safeguards and secured files and buildings. Additionally, HD Vest requires its employees and Advisors to comply with its privacy standards and policies, which are designed to protect customer information.

HD Vest has also established a separate Online Privacy Policy governing the collection of information obtained through the HD Vest websites. For further information, please visit the page [HD Vest Online & Mobile Privacy Policy](http://www.hdvest.com) available on www.hdvest.com.

To Limit Our Sharing:

To limit the information your Advisor can retain or share after he or she leaves HD Vest mail us the form included in this notice.

HD Vest Financial Services® is the holding company for the group of companies providing financial services under the HD Vest name. Securities offered through HD Vest Investment ServicesSM, Member SIPC, Advisory services offered through HD Vest Advisory ServicesSM
6333 N. State Highway 161, Fourth Floor, Irving, TX 75038, (972) 870-6000 1501163 09/16

Mail-In Opt-Out Form To:



HD Vest Operations Department
PO Box 142829
Irving, TX 75014-2829

- By completing and submitting this Opt-Out Form, I am instructing HD Vest Financial Services (“HD Vest”) to not allow my HD Vest Advisor to retain my Personal Information if s/he terminates his or her relationship with HD Vest, or share my personal information with any new firm s/he may join.

Your election to opt-out will not be recognized if you do not complete all of the information below. Please print legibly.

Name _____

Address _____

City _____ State _____ Zip Code _____

Account Number(s) _____

HD Vest Advisor Name _____