

## **PRIVACY POLICY**

Apex Clearing Corporation (“Apex”) carries your account as a clearing broker by arrangement with your broker-dealer or registered investment advisor as Apex’s introducing client. At Apex, we understand that privacy is an important issue for customers of our introducing firms. It is our policy to respect the privacy of all accounts that we maintain as clearing broker and to protect the security and confidentiality of non-public personal information relating to those accounts. Please note that this policy generally applies to former customers of Apex as well as current customers.

### **Personal Information Collected**

In order to service your account as a clearing broker, information is provided to Apex by your introducing firm who collects information from you in order to provide the financial services that you have requested. The information collected by your introducing firm and provided to Apex or otherwise obtained by Apex may come from the following sources and is not limited to:

- Information included in your applications or forms, such as your name, address, telephone number, social security number, occupation, and income;
- Information relating to your transactions, including account balances, positions, and activity;
- Information which may be received from consumer reporting agencies, such as credit bureau reports;
- Information relating to your creditworthiness;
- Information which may be received from other sources with your consent or with the consent of your introducing firm.

In addition to servicing your account, Apex may make use of your personal information for analysis purposes, for example, to draw conclusions, detect patterns or determine preferences.

### **Sharing of Non-public Personal Information**

Apex does not disclose non-public personal information relating to current or former customers of introducing firms to any third parties, except as required or permitted by law, including but not limited to any obligations of Apex under the USA PATRIOT Act, and in order to facilitate the clearing of customer transactions in the ordinary course of business.

Apex has multiple affiliates and relationships with third party companies. Examples of these companies include financial and non-financial companies that perform services such as data processing and companies that perform securities executions on your behalf. We may share information among our affiliates and third parties, as permitted by law, in order to better service your financial needs and to pursue legitimate business interests, including to carry out, monitor and analyze our business, systems and operations.

### **Security**

Apex strives to ensure that our systems are secure and that they meet industry standards. We seek to protect non-public personal information that is provided to Apex by your introducing firm or otherwise obtained by Apex by implementing physical and electronic safeguards. Where we believe appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Apex endeavors to ensure that third party service providers who may have access to non-public personal information are following appropriate standards of security and confidentiality. Further, we instruct our employees to use strict standards of care in handling the personal financial information of customers. As a general policy, our staff will not discuss or disclose information regarding an account except; 1) with authorized personnel of your introducing firm, 2) as required by law or pursuant to regulatory request, or 3) as authorized by Apex to a third party or affiliate providing services to your account or pursuing Apex’s legitimate business interests.

### **Access to Your Information**

You may access your account information through a variety of media offered by your introducing firm and Apex (i.e. statements or online services). Please contact your introducing firm if you require any additional information. Apex may use “cookies” in order to provide better service, to facilitate its customers’ use of the website, to track usage of the website, and to address security hazards. A cookie is a small piece of information that a website stores on a personal computer, and which it can later retrieve.

### **Changes to Apex’s Privacy Policy**

Apex reserves the right to make changes to this policy.

**How to Get in Touch with Apex about this Privacy Policy**

For reference, this Privacy Policy is available on our website at [www.apexclearing.com](http://www.apexclearing.com). For more information relating to Apex's Privacy Policy or to limit our sharing of your personal information, please contact:

Apex Clearing Corporation

Attn: Compliance Department 350 N. St. Paul St., Suite 1300

Dallas, Texas 75201

214-765-1055

**SAFEGUARDING YOUR PRIVACY CONSUMER NOTICE CUSTOMER IDENTIFICATION PROGRAM NOTICE  
CUSTOMER INQUIRY NOTICE**

Tradier Brokerage Inc. ("Tradier") is committed to safeguarding the confidentiality and privacy of the information we maintain on all our clients. This notice describes how we manage and safeguard information about you, our individual client, who seeks or obtains financial products or services from us primarily for personal, family or household purposes. It covers how we protect the information which we have about our current and former individual clients. Tradier does not share any client information with nonaffiliated third parties for marketing purposes. We never sell any client information to anyone for any reason. Tradier will share information with third parties that you have identified as having a commercial relationship with you and approve sharing information. If your account is managed by, or associated with, a Registered Investment Adviser, then Tradier may share any and all information regarding your account to your advisor on record. This site collects IP addresses or domain names anytime a Web page is requested from our server. This information is used to analyze site traffic. The URL of a referring Web page also may be logged for the same purpose. Information provided by site visitors is collected to assist us in the performance of services offered by Tradier. If you send us an email, your email address will be displayed in the message that we receive. We use this information to reply to your inquiry and we keep your email message for our records and future reference as required by regulation. It is the privacy policy of Tradier not to share that information with other unaffiliated companies or organizations, unless we are required to do so by law, court order or regulatory requirements. Collected information is not shared with other unaffiliated organizations for commercial purposes. Frequently, users voluntarily provide nonpublic personal information to Tradier. If you provide your mailing address to us online, then you may receive periodic mailings from us with information relating to the business and services of Tradier. Likewise, if you provide us your telephone number online, then you may receive telephone contact from us with information relating to the products and services of Tradier. As e-commerce evolves, we shall make the appropriate updates of security policy changes on our website for your review. The success of our business relationship with online clients depends on our ability to maintain the trust of our users. If you have any questions, please contact us. If you are a current Tradier client and wish to opt-out, you can do so by calling 980-272-3880. IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents. CUSTOMER INQUIRY NOTICE SEC Rule 17a-3(a)(18) requires our Firm to maintain a record indicating that each client or investor has been provided with a notice containing the address to which you may transmit any inquiries that you may have respecting our Firm. Customer inquiries may be directed to: Peter Laptewicz PO Box 49056 Charlotte, NC 28277 980-282-3880