

## Advisor Group, Inc. Privacy Policy

Last Updated January 1, 2023

Advisor Group, Inc. and its Affiliates — American Portfolios Advisors, Inc., American Portfolios Financial Services, Inc., American Portfolios Holdings, Inc., Arbor Point Advisors, LLC, FSC Securities Corporation, Infinex Financial Holdings, Inc., Infinex Investments, Inc., Ladenburg Thalmann Advisor Network, LLC, Ladenburg Thalmann & Co., Inc., Ladenburg Thalmann Asset Management, Royal Alliance Associates, Inc., SagePoint Financial, Inc., Securities America, Inc., Securities America Advisors, Inc., Triad Advisors, LLC, Triad Hybrid Solutions, LLC, Triad Insurance, Inc., Vision2020 Wealth Management Corp., and Woodbury Financial Services, Inc. (collectively, “we,” “our,” “us,” or “Advisor Group”) care about your privacy and recognize the importance of protecting personal information. This Privacy Policy describes the types of personal information we may collect, including during your visit to our websites included in the below table (“Sites”), and when you communicate or interact with us or seek or use our products and services; how we use personal information; how we protect personal information; and how you can exercise options regarding personal information. Please note that some of our Sites have their own specific privacy policies. When that is the case, this Privacy Policy applies in addition to those policies.

### Sites

<a href="http://advisorgroup.com">advisorgroup.com</a>	<a href="http://www.ladenburgfunds.com">www.ladenburgfunds.com</a>	<a href="https://www.securitiesamerica.com">https://www.securitiesamerica.com</a>
<a href="http://www.americanportfolios.com">www.americanportfolios.com</a>	<a href="http://www.ltam.com">www.ltam.com</a>	<a href="https://www.saequipt.com/">https://www.saequipt.com/</a>
<a href="http://www.blog.americanportfolios.com">www.blog.americanportfolios.com</a>	<a href="http://www.npim.com">www.npim.com</a>	<a href="https://www.arborpointadvisors.com/">https://www.arborpointadvisors.com/</a>
<a href="https://client.infinexgroup.com/">https://client.infinexgroup.com/</a>	<a href="http://royalalliance.com">royalalliance.com</a>	<a href="http://spfequipt.com">spfequipt.com</a>
<a href="http://www.fscsecurities.com">www.fscsecurities.com</a>	<a href="http://sagepointfinancial.com">sagepointfinancial.com</a>	<a href="http://www.thebreslingroup.com">www.thebreslingroup.com</a>
<a href="http://www.infinexgroup.com">www.infinexgroup.com</a>	<a href="http://woodburyfinancial.com">woodburyfinancial.com</a>	<a href="http://www.triadadvisors.com">www.triadadvisors.com</a>
<a href="https://infinet.infinexgroup.com/">https://infinet.infinexgroup.com/</a>	<a href="http://fscequipt.com">fscequipt.com</a>	<a href="http://wfsequipt.com">wfsequipt.com</a>
<a href="http://mysuccessionplan.com">mysuccessionplan.com</a>	<a href="http://raaequipt.com">raaequipt.com</a>	<a href="http://careers.advisorgroup.com">careers.advisorgroup.com</a>

This Privacy Policy does not apply to employment and recruitment-related personal information collected from employees, job applicants, contractors, financial representatives, other non-employee workers, or similar individuals, who are residents of California, for whom we provide separate privacy policies and notices in the context of their employment, working, or professional relationship with Advisor Group.

By visiting our Sites, or using our products or services, you consent to our collection and use of personal information as described in this Privacy Policy and in the [Terms of Use](#), or the [Terms and Conditions](#) that apply. If you do not agree to this Privacy Policy or our Terms of Use, please do not use our Sites, products, or services.

## 1. *Changes to this Privacy Policy*

We may revise this Privacy Policy at our discretion and will update it periodically. We will post any material changes on this page and update the “Last Updated” date, so be sure to check back periodically. For material retroactive changes, we will notify you consistent with the law. Your continued use of our Sites and services after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.

## 2. *Personal Information We Collect and Purposes for Which We May Use It*

The personal information we may collect about you depends on our relationship with you. For instance, if you are a client of ours, we will collect information about you to open and service your accounts. If you use our Sites, we may automatically collect information from your use of the Sites (see “Marketing and Website Analytics” below).

For purposes of this Privacy Policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include de-identified or aggregate information, or publicly available information lawfully available from governmental records.

### *Categories of Personal Information*

Below we categorize types of personal information we have collected in the last 12 months. Depending on our relationship with you, and to the extent consistent with law, we may continue to collect these types of personal information and use it for the purposes listed further below. Please note that the examples of the types of information within these categories that may qualify as personal information are not intended to be comprehensive and that there may be overlap between categories.

We do not use sensitive personal information to infer characteristics about you and typically limit our use of sensitive personal information to (1) perform services, such as to provide benefits to our customers; (2) to resist deceptive, fraudulent, or illegal actions; and (3) to ensure the physical safety of our personnel, customers, visitors, and others.

With respect to each of the categories of data below, we may also disclose personal information with any person to whom we may transfer any of our rights or obligations under any agreement, or in

connection with a sale, merger, or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or to any person who is otherwise deemed to be our successor or transferee. We may also collect and use information as described to you when collecting the information.

<i>Categories of Personal Information Obtained</i>	<i>Our Uses of Personal Information</i>
<p><i>Contact information and other personal identifiers, such as name, postal and email address, phone number, unique personal identifier, account name, registration number, tax identification number, Social Security number, driver’s license number, passport number, and similar identifiers.</i></p>	<ul style="list-style-type: none"> <li>➤ Offering and providing products and services (including opening and servicing accounts, conducting transactions, communicating, fulfilling requests, and responding to questions, providing information and events, making suitability determinations, conducting administrative and managerial tasks associated with our client services, etc.), marketing our products and services, connecting individuals with other products and services.</li> <li>➤ Operating our business; fulfilling contractual obligations; ensuring the security and sufficiency of our networks, systems, products, services, property, and personnel; monitoring, assessing, designing, and improving our operations, products, and services; managing risk.</li> <li>➤ To comply with legal obligations, including to respond to regulatory or law enforcement requests and as required by applicable law, to comply with governmental regulations, and legal process, such as warrants, subpoenas, and court order.</li> <li>➤ Supervising and providing compliance, educational, and licensing-related services, and practice support to representatives.</li> <li>➤ Conducting internal investigations; preventing fraud; addressing disciplinary matters; establishing or defending legal claims or allegations; protecting property, personnel, or members of the public.</li> </ul>
<p><i>Financial, commercial and benefits information, such as records and information about personal property or financial accounts, investments, products, and services; purchasing or consuming histories or tendencies; investment objectives, risk tolerance, time horizon, assets, holdings and financial interests, income and compensation, expenses, tax information, transaction history, investment experience; other account information; information on savings, insurance, and retirement; other benefits-related information; and other commercial and</i></p>	<ul style="list-style-type: none"> <li>➤ To perform services on behalf of the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose. Such business purposes include maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.</li> </ul>

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<p>financial information.</p>	<ul style="list-style-type: none"> <li>➤ To verify or maintain the quality of a product or, service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> </ul>
<p><i>Internet or electronic activity information and device and online identifiers</i>, such as online identifier or device ID, or other similar identifiers; information regarding interaction with a website, device, database, or application, including time and duration of internet and network connections; browsing history; and calls and emails sent and received.</p>	<ul style="list-style-type: none"> <li>➤ To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To perform services on behalf of the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose. Such business purposes include maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.</li> <li>➤ To verify or maintain the quality of a product or, service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> </ul>
<p><i>Demographic, protected classification, and association information</i>, such as date of birth/age, sex, marital status, race, gender, ethnicity, citizenship and visa status, military or veteran status; association-related information, such as whether an individual is related to someone who is employed in the securities</p>	<ul style="list-style-type: none"> <li>➤ To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> </ul>

<p>industry, information about dependents, beneficiaries, and parties related to an account, emergency contact information; and disability and health-related information.</p>	<ul style="list-style-type: none"> <li>➤ Regulatory registration.</li> </ul>
<p><i>Audio, electronic, visual, or similar information</i>, including photographs, CCTV footage and other video event recordings, and voicemail and other telephone recordings (e.g., for call center support lines).</p>	<ul style="list-style-type: none"> <li>➤ To verify or maintain the quality of a product or service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> </ul>
<p><i>Education and professional background information</i>, such as degrees, licenses, professional designations, or certificates sought or obtained; training records, transcripts, performance and talent management information; resumes, work history, firm element, job descriptions; references; compensation, bonus, stock-option information, and similar information; membership in professional bodies, appointments, gross dealer concession, outside business activities; publications and work product; discipline, conduct, absence records; and criminal history.</p>	<ul style="list-style-type: none"> <li>➤ To verify or maintain the quality of a product or service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To perform services on behalf of the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose. Such business purposes include maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.</li> <li>➤ Regulatory registration.</li> </ul>
<p><i>Inferences</i> drawn from personal information to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance, and business development and practice analysis.</p>	<ul style="list-style-type: none"> <li>➤ To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.</li> <li>➤ To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer’s personal information is reasonably necessary and</li> </ul>

	<p>proportionate for this purpose.</p> <ul style="list-style-type: none"> <li>➤ To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> </ul>
<p><i>Other personal information provided to us or stored on our systems, such as information provided by email or in a phone call.</i></p>	<ul style="list-style-type: none"> <li>➤ To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.</li> <li>➤ To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> </ul>

<i>Categories of Sensitive Personal Information Obtained</i>	<i>Our Uses of Sensitive Personal Information</i>
<p><i>Government identifiers, including Social Security number, driver’s license number, state identification card number, passport number.</i></p>	<ul style="list-style-type: none"> <li>➤ To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.</li> <li>➤ To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ To ensure the physical safety of natural persons, provided that the use of the consumer’s personal information is reasonably necessary and</li> </ul>

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	<p>proportionate for this purpose.</p> <ul style="list-style-type: none"> <li>➤ For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer’s current interaction with the business, provided that the personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer’s experience outside the current interaction with the business.</li> <li>➤ To perform services on behalf of the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose. Such business purposes include maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.</li> <li>➤ To verify or maintain the quality of a service that is owned or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer’s personal information is reasonably necessary and proportionate for this purpose.</li> <li>➤ For purposes that do not infer characteristics about the consumer.</li> </ul>
<p><i>Biometric information</i>, specifically fingerprint information</p>	<ul style="list-style-type: none"> <li>➤ Regulatory registration.</li> <li>➤ Criminal background checks for hiring purposes.</li> </ul>
<p><i>Health information</i>, such as symptoms of COVID-19, vaccination status, COVID-19 diagnosis, COVID-19 related testing results, and whether you have or display certain symptoms</p>	<ul style="list-style-type: none"> <li>➤ Office management.</li> <li>➤ Potential legal obligations.</li> </ul>

### 3. *Disclosing Personal Information*

We have in the last 12 months disclosed each of the categories of personal information above to parties outside of Advisor Group for a business purpose and may continue to do so.

We may disclose personal information internally and with the following types of parties:

- *Service providers, contractors, and vendors*, including to process transactions, maintain accounts, and provide information technology, marketing, and recruiting and human resources-related

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services

- *Third parties and non-affiliates*, such as financial professionals, representatives, other financial institutions, credit bureaus, product sponsors, and business contacts and partners related to the provision or offering of products or services, human resources, and business operations, management, and administration
- *Governmental authorities and other third parties*, such as self-regulatory organizations, to comply with applicable laws and legal requirements or in response to court orders, subpoenas, government inquiries, other legal processes, to defend against claims and allegations, or to protect property, personnel, or members of the public
- *Members of the public and our clients when permitted by law*, for instance, items of interest pertaining to our business (e.g., photographs taken at our events)
- *Other parties to which you direct us to disclose personal information*, or to which we inform you we may disclose your data, or to which we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or to any person who is otherwise deemed to be our successor or transferee

Please note that you may interact with financial professionals, other financial institutions, or other third parties (sometimes referred to as non-affiliates, which are companies not related to Advisor Group by common ownership or control) or direct us to disclose information with such parties as we provide products or services to you. Advisor Group may not control the data practices of such parties, and we recommend you review any applicable privacy policies for information about these parties' data practices.

#### 4. *Sources of Personal Information*

We collect or receive the categories of personal information above from:

- Communications and interactions with individuals seeking to obtain or using our products and services or their agents and representatives, or other persons communicating or otherwise interacting with us
- Automated collection through our Sites, services, products, applications, databases, devices, information systems and networks, including through cookies and similar technology
- Advisor Group employees and other personnel
- Financial professionals, other financial institutions, product sponsors, clearing firms, intermediaries, business partners and contacts
- Service providers, contractors, vendors, credit reporting agencies, background check companies
- Individuals interested in positions with us or those referring them to us, such as recruiters or referral sources
- Subscription information, research, and analytic services
- Public and government sources and records
- Social media platforms when you interact with our social media pages and accounts
- Records and property to which we have lawful access, e.g., device inventories for company property or documents stored on our systems



5. *Retention Period*

We retain your personal information for as long as reasonably necessary and proportionate to fulfill the purposes outlined in this Privacy Policy. Our retention of your information is governed by applicable law. We may retain personal information for longer to honor your requests, as applicable, and to comply with legal, regulatory, accounting, or other obligations.

6. *Individual Rights with Respect to Personal Information*

i. *Rights Under Federal Law*

Federal law gives consumers and customers, as those terms are defined in the Gramm-Leach-Bliley Act (“GLBA”), the right to limit some but not all sharing of their information by financial institutions like Advisor Group. Federal law also requires us to tell you how we collect, share, and protect your personal information. For information on the manner in which we may share your information if you are a client of Advisor Group, please see our privacy notices below. You may opt out of sharing as explained in these notices.

<i>Firm</i>	<i>Firm Website</i>
Arbor Point Advisors, LLC	<a href="#">Microsoft Word - 21-0845 SAI Annual Privacy Mailing (advisorgroup.com)</a>
American Portfolios Advisors, Inc.	<a href="#">Begin Typing (americanportfolios.com)</a>
American Portfolios Financial Services, Inc.	<a href="#">Begin Typing (americanportfolios.com)</a>
Infinex Investments, Inc.	<a href="#">875547_7287d8ad223a4976b111a7f08b582cda.pdf (infinexgroup.com)</a>
FSC Securities Corporation, and on behalf of Vision2020 Wealth Management, Corp.	<a href="https://www.fscsecurities.com/disclosures/privacy-notice-glba">https://www.fscsecurities.com/disclosures/privacy-notice-glba</a>
Ladenburg Thalmann Asset Management	<a href="#">Privacy-Notice.pdf (ltam.com)</a>

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Ladenburg Thalmann & Co.	<a href="#">Privacy &amp; Disclosure (Facts and Brochure) :: Ladenburg Thalmann Financial Services Inc.</a>
Royal Alliance Associates, Inc., and on behalf of Vision2020 Wealth Management, Corp.	<a href="https://www.royalalliance.com/disclosures/privacy-notice-glba">https://www.royalalliance.com/disclosures/privacy-notice-glba</a>
SagePoint Financial, Inc., and on behalf of Vision2020 Wealth Management, Corp.	<a href="https://www.sagepointfinancial.com/disclosures/privacy-notice-glba">https://www.sagepointfinancial.com/disclosures/privacy-notice-glba</a>
Securities America Advisors, Inc.	<a href="#">Microsoft Word - 21-0845 SAI Annual Privacy Mailing (advisorgroup.com)</a>
Securities America Financial Corporation	<a href="#">Microsoft Word - 21-0845 SAI Annual Privacy Mailing (advisorgroup.com)</a>
Securities America, Inc.	<a href="#">Microsoft Word - 21-0845 SAI Annual Privacy Mailing (advisorgroup.com)</a>
Triad Advisors, LLC	<a href="#">Microsoft Word - 21-0845 TRI Annual Privacy Mailing (advisorgroup.com)</a>
Triad Hybrid Solutions, LLC	<a href="#">Microsoft Word - 21-0845 TRI Annual Privacy Mailing (advisorgroup.com)</a>
Woodbury Financial Services, Inc. and on behalf of Vision2020 Wealth Management, Corp.	<a href="https://www.woodburyfinancial.com/disclosures/privacy-notice-glba">https://www.woodburyfinancial.com/disclosures/privacy-notice-glba</a>

ii. *Rights and Additional Information Under State Law (California)*

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 (“CCPA”) regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights. In 2020, the California Privacy Rights Act (“CPRA”) amended the CCPA in 2020. Except where specifically noted below, both the CCPA and the CPRA are collectively referred to as the CCPA in this Privacy Policy.

Much of the personal information that Advisor Group collects is exempt from the rights provided by CCPA. The rights under the CCPA described below do not apply, for instance, to personal information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. As a general matter, those laws apply to nonpublic personal information about individuals who obtain financial products or services primarily for personal, family, or household purposes. This section (8.B) therefore does not cover information falling within the scope of these exemptions or to which the CCPA’s relevant provisions do not apply.

a. *Access, Deletion and Correction Rights Under the CCPA*

*Right to Request Disclosure of Personal Information We Collect (Access Rights)*

Individuals whose personal information is covered by the CCPA have a right to request that Advisor Group provide the information listed below. Our responses to these access requests will cover the personal information we have collected and maintain about the consumer on or after January 1, 2022, or for a shorter period if an exemption applies or if requested by the consumer.

- The categories and sources of personal information that Advisor Group has collected about you.
- The categories of sources from which Advisor Group collected your personal information.
- The business or commercial purposes for which Advisor Group collected and/or sold the personal information.
- The categories of any third parties with which Advisor Group disclosed the Personal information.
- The specific pieces of personal information Advisor Group collected over the past year.

Consumers may also submit a request for the following information:

- The categories of personal information, if any, Advisor Group has sold about you, the categories of third parties to which Advisor Group sold that personal information, and the categories of personal information sold to each type of third party; and
- The categories of personal information that we have disclosed for a business purpose, and the categories of third parties to whom each category of personal information was disclosed for a business purpose.

### *Right to Request the Deletion of Personal Information We have Collected from You (Deletion Rights)*

Individuals whose personal information is covered by the CCPA may also request that we delete personal information covered by the CCPA that we maintain, subject to certain exemptions. Upon receiving and verifying such a request, Advisor Group will delete the personal information, unless that information is necessary for Advisor Group to complete the transaction for which we collected the information; to provide you with a good or service you requested, or reasonably anticipated within the context of Advisor Group's ongoing business relationship with you; to perform a contract Advisor Group entered into with you; to help ensure security and integrity (e.g., to prevent, detect, or investigate data security incidents); maintain the functionality and security of Advisor Group's systems; to comply with or exercise rights provided by the law; or to use the personal information internally in ways that are compatible with the context in which you provided the information to Advisor Group, among other things. We may also retain information where another exception to the deletion requirements in the CCPA applies. Please note that if you request that your personal information be deleted, you may no longer be able to access or use certain parts of the Sites.

### *Right to Request Correction of Inaccurate Personal Information (Correction Right)*

If you determine that Advisor Group maintains inaccurate personal information about you, you have the right to request that Advisor Group correct that inaccurate personal information, considering the nature of the personal information and the purposes of the processing of the personal information. If Advisor Group receives a verifiable consumer request to correct inaccurate personal information, Advisor Group will use commercially reasonable efforts to correct the inaccurate personal information as directed by you. We will consider any documentation that you provide in connection with your right to correct whether provided voluntarily or as required by Advisor Group. We may require you to provide documentation if necessary to rebut our own documentation that the personal information at issue is accurate. We may delete the contested personal information as an alternative to correcting the information if the deletion of the personal information does not negatively impact you or you consent to the deletion.

### *How to Exercise Access, Deletion and Correction Rights*

To exercise these CCPA rights, please visit <https://www.advisorgroup.com/privacy-request> or contact Advisor Group at (866) 964-0599. You may also submit a request to Advisor Group in person through the financial representative that offered you Advisor Group services.

### *Our Processes for Responding to CCPA Requests*

**Verifying Requests:** Depending on the nature of your request, we may ask you for additional information to verify your request and identity and a declaration attesting to your identity, signed under penalty of perjury.

*Response Format:* Responses to your CCPA requests are made through Advisor Group’s online portal as well as by mail or electronic mail. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

*Timeline for Responding:* We endeavor to respond to a verifiable consumer request within the time periods provided by CCPA and CCPA regulations. We ordinarily process requests, within 45 days of its receipt. In some cases, we may extend this period to 90 calendar days. If we require more than 45 days, we will inform you or your authorized agent in writing of the reason we did so and the extension period. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

*Using an Agent:* Requests by an authorized agent must include a written, notarized declaration which documents the authorized agent’s authority to act on the consumer’s behalf. The declaration must certify that (a) the authorized agent is a natural person over the age of 18 or a business entity, (b) the agent is authorized to make a request on behalf of the consumer, and (c) that such authorization is still in full force and effect. The declaration must further enclose an authorization to request personal information on behalf of the identified consumer along with a copy of the consumer’s valid government-issued photo identification. A declaration must include the sentence “I UNDERSTAND THAT THE INFORMATION PROVIDED HEREIN IS TO BE RELIED UPON BY ADVISOR GROUP TO RESPOND TO A CALIFORNIA CONSUMER PRIVACY REQUEST IN ACCORDANCE WITH THE LAW.” An authorized agent must submit the written declaration to [Privacy@advisorgroup.com](mailto:Privacy@advisorgroup.com) and respond to any questions required for Advisor Group to verify the consumer’s identity.

The authorized agent may include, but we do not require, a copy of a valid power of attorney in order for you to use an authorized agent to act on your behalf. Please note that this subsection of the Privacy Policy does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.

## 7. *Sales and Sharing of Personal Information*

In the preceding twelve (12) months, we have neither sold your personal information to a third party nor shared your personal information to a third party for cross-context behavioral advertising.

## 8. *Minors Right to Opt In*

We do not knowingly sell the personal information of minors under 16 years of age.

## 9. *Do Not Track Requests*

Currently there is no industry standard for “Do Not Track” signals, which are options on your browser that tell website operators that you do not wish to have online activity tracked. Because there is no

industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals.

#### 10. *Non-discrimination*

We are committed to complying with the law. If you exercise any of the rights explained in this Privacy Policy, we will continue to treat you fairly. You have a right not to be discriminated against for the exercise of the privacy rights conferred by the CCPA.

#### 11. *Accessibility*

Advisor Group is committed to ensuring that our communications, such as our Sites, are accessible to individuals with disabilities. To submit accessibility-related requests or report barriers to accessibility, please contact us at (212) 551-5536 or contact [privacy@advisorgroup.com](mailto:privacy@advisorgroup.com).

#### 12. *Modifying Account Information*

If you have an account with us and you would like for us to change or update your information, please contact your financial professional or, if you are registered with eQuipt, you may log in and update your information on eQuipt.

#### 13. *Minors' Information*

The Sites are not directed to minors under the age of 16, nor do we sell information about minors. If we learn that we have erroneously collected personal information of a child under 16, we will take steps to delete such information from our files as soon as possible.

#### 14. *How We Protect Personal Information*

Advisor Group is committed to the security of your personal information. To protect your personal information from unauthorized access and use, we implement and maintain reasonable security measures that are intended to maintain the confidentiality of personal information. However, no security measures are infallible, and we cannot and do not guarantee that our safeguards will always work. Please always use caution when transmitting information, including over the internet, use strong and unique passwords that you do not also use on other online services, and notify us immediately of any concerns regarding your account or passwords.

#### 15. *International Transfers of Data*

We are based in the United States. The information you submit to us and that we collect as a result of using our Sites will be transferred to the United States. By using our Sites, products, and services, you consent to the collection, international transfer, storage, and processing of your information. If it is illegal to access our Sites or transfer your data to the United States, please do not use our Sites.

## 16. *Third-party Links*

Our Sites may contain links to third-party websites. Please be aware that we are not responsible for the privacy practices of third-party websites. This Site offers no guarantees about the safety or suitability of websites featured on third-party links, and users who choose to follow such links do so at their own risk.

## 17. *How to Contact Us*

If you have any further questions, please contact us at: Advisor Group, Inc., Attn: Privacy Office, 10 Exchange Place, Suite 1410, Jersey City, NJ; or (800) 821-5100; or [privacy@advisorgroup.com](mailto:privacy@advisorgroup.com) .

Effective Date: January 1, 2023