



Privacy Policy Gramm – Leach - Bliley Act

Effective July 1, 2001

We recognize your concerns about the privacy of your personal information. Because protecting your confidential information is very important to us, we have adopted the following policy regarding how the information you share with Lighthouse Financial Group is used and maintained. This privacy policy applies to institutions and individuals who are current and former clients of Lighthouse Financial Group. The primary reason we collect, use and share personal information is to serve you.

Lighthouse Financial Group does not sell or share personal information with non-Lighthouse Financial Group companies for the purpose of marketing their products or services to you.

Collection and Use of Personal Information. Lighthouse Financial Group is a subsidiary of Lighthouse Global Partners, and its related companies, called affiliates, that work together to bring you financial products and services. We collect only relevant client and consumer information that we are either allowed or required by law to obtain for conducting our business, such as:

- Information we receive from you on account applications or other forms, such as name, address, Social Security number, assets, income and similar information. We use this information to administer your accounts, process transactions you request, provide customer services, evaluate your investment needs, and identify other products and services that may interest you.
- Information about your transactions with us, our affiliates or other -- such as your account balance, payment history and check-writing activity. This information is used to process transactions that you request and evaluate your financial needs. When you use online products and services, we may collect data such as transaction, site navigation and optional survey information. We use this information to provide better services.
- Information we receive from a consumer reporting agency, such as credit relationships and credit history. We use this to help us determine your eligibility for products, collect or report debts owed to us, and protect our rights and property.

Sharing of Information Within Lighthouse Financial Group. All or a portion of information collected through applications and forms or information relating to your transactions and experiences with us may be shared among Lighthouse Financial Groups' affiliates. We may also share certain types of information, such as credit information, with your consent.

Sharing of Information Outside of Lighthouse Financial Group. As permitted by law, we may disclose some or all of the information described above with companies outside of Lighthouse Financial Group to service your accounts, improve our services, provide products and services you have requested, and inform you about products or services of interest to you. Such companies may include:

- Companies that provide financial services, other securities broker dealers, clearing firms, mutual fund and insurance companies

- Non-financial companies, such as companies that perform services on our behalf, companies that prepare account statements, or companies that assist us in marketing our services or communicating with you
- Others such as independent contractors or technical-system consultants who program our software, government agencies and regulators, consumer reporting agencies, and other outside parties as permitted or required by applicable laws

Protecting the Confidentiality of Your Personal Information. All Lighthouse Financial Group employees are instructed to use strict standards of care regarding the confidentiality of your nonpublic personal information as outlined in Firm policies. Employees not adhering to our Firm policies are subject to disciplinary action. We require outside companies and independent contractors to whom we provide client information for marketing, servicing or processing purposes to enter into confidentiality agreements that restrict the use of the information to those purposes. We maintain physical, electronic and procedural safeguards that comply with applicable laws to protect your nonpublic personal information.

If you have questions regarding Lighthouse Financial Group's Privacy Policy, please contact us at Lighthouse Financial Group, LLC, Compliance Department, 420 Lexington Avenue, Suite 1430, New York, NY 10170 or compliance@lhfg.net or 800.831.6606.