

MerCap Securities, LLC
“MerCap”
Privacy Policy and SIPC Disclosures

1. Collection of Information. MerCap and our affiliates (“we” or “us”) are committed to maintaining the trust and confidence of our customers. We want you to understand how we protect your privacy when we collect and share your personal information. The personal information we collect may include:

- a. Information that you provide us when you apply for or obtain a financial product or service from us.
- b. Information about you resulting from any transaction involving a financial product or service between you and us.
- c. Information that we otherwise obtain about you in connection with offering or providing a financial product or service to you, including information about your transactions with non-affiliated third parties and information from consumer-reporting agencies.
- d. Information we collect through Internet “cookies.” (These are information collection devices that we may use for administrative purposes, such as to store your preference for certain kinds of information. You may set your computer’s browser to decline cookies, although you may then not be able to utilize certain features of our website.)

Depending upon circumstances, personal information collected by us may include, among other things, your name, address, social security number, income, assets, risk tolerance, investment objectives, account balances, types and amounts of financial transactions, employment history, payment and credit history, credit scores or other consumer report information, or the fact that you are or have been one of our customers or have applied for or obtained any financial products or services from us.

2. Protection of Information. Keeping your information secure is one of our most important responsibilities. Within our affiliated group, we restrict access to your personal information to those employees and agents who assist us in providing products or services to you. We maintain physical, electronic and procedural safeguards that comply with applicable law to protect your personal information. We train our employees in the proper handling of personal information. When we use other companies to help provide our services to you, we require them to protect the confidentiality of personal information they receive.

3. Information Sharing with Affiliates. We do not share your personal information with our affiliated companies for marketing purposes. However, we may share, within our family of affiliated companies, information about our transactions or experiences with you, such as your name, social security number, account or payment history and similar information. For example, if you currently do business with one of our affiliates, or if you ask to receive information or offers from them, we may share your personal information with those affiliates. Our affiliates may also continue to use personal information they receive

from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

4. Information Sharing with Non-Affiliates. Unless required by law, we do not share your personal information with non-affiliated third-parties except that we reserve the right to disclose all of your personal information that we collect, as described above, as follows:

- a. **For Marketing Purposes:** Disclosure to non-affiliated third parties that have agreed to market our products or services (or to jointly market financial products or services) offered under contracts between us and other financial institutions that prohibit the third parties from disclosing or using your personal information other than to carry out the purposes for which you disclosed the information (including use permitted by applicable regulations in the ordinary course of business to carry out those purposes);
- b. **For Other Lawful Purposes:** Disclosure to other non-affiliated third parties as specifically permitted by federal law, such as to facilitate the processing of transactions on your behalf or to assure safe custody of your assets;
- c. **If Your Registered Representative (“RR”) Terminates His/Her Relationship with Us:** Disclosure to the RR’s new brokerage or investment advisory firm (“New Firm”) as described below:

- i. **Disclosures Requiring Your Affirmative Consent.** If your primary address is in a state that requires your affirmative consent to share your personal information with the New Firm (such as California or Vermont), then you must give your written consent before we will allow your RR to take any of your personal information to that New Firm. You can withdraw your consent at any time by contacting us in writing at the address provided below.

- ii. **Disclosures Allowed Unless You Affirmatively “Opt Out.”** We or your RR may disclose your personal information to the New Firm unless you instruct us not to allow such disclosure. **If you do not want us or your RR to disclose your personal information to the New Firm, and if you do not want your RR to retain copies of your personal information when your RR terminates his or her relationship with us, you may request that we and/or your RR limit the information that is shared with the New Firm by filling out the Privacy Choices Notice, which is attached to this Privacy Notice, and mailing it to: MerCap Securities, LLC, Compliance Department, 40 Darby Road, Paoli, PA 19301.**

- iii. Certain **Permitted Disclosures.** MerCap entered into the Protocol for Broker Recruiting (the “Protocol”) with certain other brokerage firms, and, anything above to the contrary notwithstanding, if MerCap remains a signatory to the Protocol as of the effective date of your advisor’s termination from MerCap, then MerCap will permit your RR to take your name, address, phone number, e-mail

address, and the account title of the accounts serviced (or additional information as permitted if the Protocol is amended) while your RR was associated with MerCap if your RR joins one of these Protocol brokerage firms. The ability to take this customer information may be restricted by agreements between your financial institution and your RR.

5. If Your Relationship With Us Ends. If your relationship with us ends, we will continue to treat personal information in accordance with this Privacy Notice. That means that we may continue to share your personal information as described above or permitted by law. However, if you notify us of your election not to have us share your personal information with others before or after your relationship with us ends, we will honor that request.

6. Additional State Opt-Out Information. The information-sharing practices described above are in accordance with Federal Law. In states where additional notification is required before you can provide an effective opt-out, we will contact you separately regarding your opt-out choices.

7. Viewing/Correcting Information. You may write to us at the address below with any questions you may have about your personal information. You may see and copy the personal information that we have about you in person. If you prefer, we will copy and send it you. If you think the personal information that we have in our files is incomplete or incorrect, you may request that we complete or correct the disputed personal information. We will review your request. We will either honor the request or explain why we did not do so. If we reject the requested change, you may file a written statement of dispute with us. We will include the written dispute in future disclosures of that

personal information. We will send the written dispute to anyone you ask who received your personal information from us in the past two years. To exercise these rights, please send us a written request. Please include your name, address, account number, daytime phone number, and the personal information that you would like access to or that you believe needs correction. We may charge a small fee to collect and send the personal information to you. To protect your personal information, we may ask you to verify your identity and to provide other details to respond to your request.

8. Changes to Our Privacy Policy Notices. We reserve the right to change the terms of this Privacy Notice from time to time. Our Privacy Notice, as in effect from time to time, is continually posted on our website. By electing to become one of our customers or by receiving our products and related services, you agree to receive copies of our Privacy Notice and any amendments to it from our website, unless you notify us otherwise in writing at the address provided below. You may view our Privacy Notice online at www.mercapsecurities.com and go to the MerCap tab. The forgoing notwithstanding, we will provide you with a written copy of our Privacy Notice at least annually.

9. SIPC. MerCap is a member of The Securities Investor Protection Corporation, SIPC. For further information concerning SIPC, please contact them directly at SIPC.org or 202-371-8300.

Our mailing address for purposes of this Privacy Notice is: MerCap Securities, LLC, Compliance Department, 40 Darby Road, Paoli, PA 19301. Questions related to the protection of your social security number or your other personally identifiable information can be addressed by calling 877-784-8021.

Please cut along dotted line

Personal Information Limitation Notice

If your RR departs MerCap and you would like to limit the personal information that your RR discloses or takes with him or her to another brokerage or investment advisory firm upon the termination of his or her relationship with MerCap, please complete and mail the following form to:

**MerCap Securities, LLC
Attn: Compliance Dept
40 Darby Road
Paoli, PA 19301**

Please limit the personal information about me that my RR discloses or takes with him or her to another brokerage or investment advisory firm upon terminating his or her relationship with MerCap. I understand that you may disclose my name, address, telephone number, email and the account title of the accounts serviced by my RR to such brokerage or investment advisory firm. You must complete ALL of the requested information for your request to be effective.

Customer 1:

Name _____

Address _____

City _____ State and Zip _____

Account Number or SSN _____

Signature _____ Date _____

Customer 2:

Name _____

Address _____

City _____ State and Zip _____

Account Number or SSN _____

Signature _____ Date _____