

First Clearing, LLC Privacy Statement

First Clearing, LLC (First Clearing) provides execution, clearance and settlement services for your Firm's customer and proprietary accounts. First Clearing¹ is dedicated to protecting your privacy and providing the highest level of service. We want you to understand how we gather and may share client information at First Clearing and how we protect that information in everything we do.

How We Protect Client Information

Keeping financial information secure is our responsibility and our commitment to you.

- We protect client information through physical, electronic, contractual and procedural measures that comply with or exceed applicable laws and standards.
- We train our employees to protect client information and only authorize access for employees who we believe have a business need for that information. Employees are held accountable by our Code of Conduct and Ethics to properly protect client information.
- We maintain processes that provide for the proper physical security of workspaces and records.
- We require contractors and other companies that provide services on our behalf to protect information, and we prohibit those companies from using it for any other purpose. We limit the information to these companies to the information that we believe is necessary to fulfill their responsibilities or to deliver a financial service to you.

If you believe you are a victim of fraud or identity theft, please contact your financial professional for assistance, which may include placing holds on your accounts. Also, see the "Fraud and Identity Theft Assistance" section of our Privacy Statement for additional information.

How We Gather Client Information

The information we gather comes from a variety of sources, including:

- Information you provide (such as name, address and telephone number).
- Information about your transactions with First Clearing and Your Firm (such as account balance and payment history).
- Information we receive from credit reporting agencies and other companies and agencies (such as your credit history).

How We Manage Information to Serve Your Needs

In the course of conducting business, we may disclose some or all of the previously described information about clients and former clients to our affiliates and non-affiliated third parties, as allowed by law. For example, in order to serve your needs, we may provide all of the information we gather to:

- Companies that perform business operations for us (such as check printing).
- To select credit reporting agencies.
- Others as permitted or required by law (such as to protect against fraud or in response to a subpoena).

We do not provide information about clients to other companies for their own marketing purposes. Our policies for sharing client information, both within and outside of First Clearing as described above, also apply to all of the information we have gathered about former clients of First Clearing.

Fraud and Identity Theft Assistance

If you believe you may be a victim of identity theft:

1. Contact Your Firm for assistance such as to place holds on your accounts.
 2. Contact the Social Security Administration's Fraud Hotline at 800-269-0271 to report fraudulent use of your identification information.
 3. Report the incident as quickly as possible to any one of the credit reporting agencies:
Experian 888-397-3742
Equifax 800-525-6285
Trans Union 800-680-7289
- You should review your current credit bureau report to identify any unauthorized accounts or inquiries and ask the credit reporting agency about placing a Victim Alert Flag on your files.

4. File a police report in your local jurisdiction and retain the report number and the name of the officer who took the report.
5. File a complaint with the Federal Trade Commission (FTC) by contacting the FTC's Identity Theft Hotline: 1-877-IDTHEFT.

How to Protect Yourself

We recommend that you follow these security measures to protect and help prevent potential misuse of personal information about you:

- Protect and properly dispose of your account records.
- Do not share account information, passwords, user ID's, PINs, code words or other confidential information with others.
- Do not provide confidential information by telephone to unknown callers.
- Do not provide confidential information online unless you initiated the contact, know the party with whom you are dealing, and provide the information through a secure channel.
- When conducting business over the Internet, always use a secure browser, exit online applications as soon as you finish using them, and make sure you have virus protection and a firewall and update them regularly.
- Monitor your credit report for accuracy. By law, you are entitled to receive one free credit file disclosure every 12 months from each of the nationwide consumer credit reporting companies. To learn more or request a copy of your credit report, visit annualcreditreport.com or call 1-877-322-8228.

We Strive to Maintain Accurate Information

We strive to maintain complete and accurate information about you and your accounts with Your Firm. If you ever believe that our records contain inaccurate or incomplete information about you, please let us or Your Firm know immediately. We are committed to resolving any inaccuracies as quickly as possible.

Credit Reporting Agencies

If you believe we have reported inaccurate information about your account to any credit reporting agency, please let us know in writing. Be sure to include your complete name, current address, Social Security Number, telephone number, account number, type of account, specific item of dispute and the reason you believe the information is wrong. Send your notice to: First Clearing, LLC, One North Jefferson Ave., St. Louis, MO 63103. We will investigate your concern and correct any inaccuracies we find. We will inform you of any actions we take.

If You Have Questions, Contact Us

We welcome the opportunity to answer any questions you may have about this statement or the safeguarding and confidentiality of information about our clients. Please contact Your Firm, or write to us at First Clearing, LLC, One North Jefferson Ave., St. Louis, MO 63103.

Other Applicable Laws

The practices described above are in accordance with federal law. You may have other protections under applicable state laws, such as those in Vermont, California and Nevada. To the extent these state laws apply, we will comply with them when we share information about you. For example, Vermont law places additional limits on sharing information about Vermont residents. As long as they remain residents of Vermont, we will not share information we collect about Vermont residents to companies outside of First Clearing, except:

- To companies that perform services on our behalf;
- With the authorization or consent of the Vermont resident; or
- As permitted or required by law.

We also will not share credit information about Vermont residents received from others within FCC except with the authorization or consent of the Vermont resident.

For Nevada residents: Nevada law also requires that we provide you with the following contact information:

First Clearing, LLC
One North Jefferson Ave.
St. Louis, MO 63103

Bureau of Consumer Protection
Office of the Nevada Attorney General
555 E. Washington Street, Suite 3900
Las Vegas, Nevada 89101
Phone: (702) 486-3132
Email: BCPINFO@ag.state.nv.us

¹ This Privacy Statement explains how we handle and protect information and replaces any Privacy Statements previously provided. The Privacy Statement applies only to consumers who are clients or former clients whose accounts are introduced to First Clearing, LLC by introducing firms and have established such relationships with First Clearing, LLC in the United States. The policies and practices described in this Privacy Statement are subject to change, but we will notify you if there are significant changes. This Privacy Statement is issued as of March 2009.