

Feltl and Company

SECURITIES BROKERAGE AND INVESTMENT BANKING

Privacy Policy

Feltl and Company (“Feltl”) believes confidentiality, protection, and integrity of customer information is critical to providing quality service. The following policy is designed to protect your right to privacy and designed to prevent misuse of your personal information. There are three guidelines to our privacy policy:

- Your personal information is gathered for business purposes only;
- Personal information is shared only with those individuals or third parties who have a business or regulatory reason to access that information;
- Your personal information remains confidential and is never sold to an outside agency or third party for any reason.

Personal Information

At the time you open an account with Feltl certain information about you is collected by your Investment Executive (“IE”) and is periodically updated for changes in your personal situation. When you open a securities account Feltl and its IE, have an obligation to collect certain personal information about you or the account owner. This is a practical and regulatory requirement since the IE can make appropriate recommendations only after having sufficient knowledge and information.

The personal information we collect about you includes your name, address, taxpayer identification number, date of birth, number of dependents, citizenship, occupation, income, total assets, liquid assets, investment experience, investment objectives and tolerance for market risk.

Third Parties

For legitimate business purposes we may share the personal information described above with the following non-affiliated third parties:

- Companies with whom you have requested a relationship, such as issuers of private debt or equity securities, mutual fund and insurance companies, banks, attorneys and accountants;
- Governmental agencies and Regulatory authorities required by law;
- Companies under contract to perform services for Feltl such as statement vendors, data processing and software providers and the provider of clearing services.

Your account is carried by RBC Correspondent Services (“RBC CS”), a division of RBC Capital Markets, LLC. Feltl has contracted with RBC CS to act on our behalf, in the capacity of our clearing firm. Your personal information is provided to RBC CS, in order for them to provide bookkeeping services, receive and distribute cash and securities, hold assets in your account and generally perform the clearing functions. A copy of RBC CS’ Privacy Statement is available upon request and will be provided when opening your account.

Confidentiality

Access to your personal information is limited to your IE and those employees who need it to conduct our business. Our employees are required to protect the confidentiality of your personal information, and must follow established procedures to do so. Employees are instructed and educated as to their obligations and we employ physical, administrative and electronic safeguards to ensure compliance with our established procedures.

Additional Information

Complete and accurate information is of the utmost importance to make appropriate recommendations. We urge you to notify us if there are changes to your personal information. If you have further questions or concerns about your personal information or this Privacy Policy, please contact our Compliance Department at (612) 492-8800.

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