



Customer Privacy Policy

Securities Industry Records Services, LLC (“**SIRS**”) is very sensitive to concerns about the use and security of personal information provided to us by our broker/dealer clients. As a requirement of §240.17a-4, personal information of our broker/dealer clients and their customers is made accessible to us and is designed to be accessed by **SIRS** only in response to requests from authorized regulatory authorities.

For the purposes described above, brokers/dealers knowingly provide **SIRS** with access to confidential firm records and to their customers’ personal information.

In response to requests from authorized regulators, and as required by §240.17a-4, we may disclose all of the information we collect to these authorized parties.

We also may disclose information about our broker/dealer clients and their customers (a) to comply with legal process, such as subpoenas and court orders, (b) to law enforcement authorities if we believe a crime has been committed, (c) if you give us your consent, and (d) as otherwise permitted by law.

We do not disclose nonpublic personal information about our current or former clients or their customers to unaffiliated third parties except as set forth in this policy.

General Provisions

SIRS has always been committed to maintaining the accuracy, confidentiality, and security of your personal and corporate information. We have established Privacy Principles to govern our use of customer information.

SIRS does not sell, share or distribute Customer Information to any third party organization.

Accountability

SIRS is responsible for maintaining and protecting customer information under its control.

Identifying Purposes

The purposes for which customer information is collected shall be identified before or at the time the information is collected.

Consent

The knowledge and consent of the customer are required for the collection, use or disclosure of customer information except where required or permitted by law.

Limiting Collection

The customer information collected must be limited to those details necessary for the purposes identified by **SIRS**. Information must be collected by fair and lawful means.



Limiting Use, Disclosure and Retention

Customer information may only be used or disclosed for the purpose for which it was collected unless the customer has otherwise consented, or when it is required or permitted by law. Customer information may only be retained for the period of time required to fulfill the purpose for which it was collected.

Accuracy

Customer information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Safeguarding Customer Information

Customer information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

Openness

SIRS is required to make information available to customers concerning the policies and practices that apply to the management of their information.

Customer Access

Upon request, a customer shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Customers may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate.

Handling Customer Complaints and Suggestions

Customers may direct any questions or inquiries with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy at **SIRS**.

If you would like to unsubscribe to solicitations from **SIRS**, please notify **SIRS** via email (info@sirsco.com), phone (866.568.7151), or regular mail (1420 W 8700 South, West Jordan, UT 84088).

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