



# IPC's Privacy Policy

## IPC's Commitment to Your Privacy

Our relationship with you is our most valuable asset. We therefore would like to assure you that your personal information is safe in our hands. We take the utmost care to maintain the confidentiality of your private information, whether it is provided to us in person, by telephone, in writing, through our financial correspondents, or by other means. We do not sell our clients' information to any third parties, nor do we disclose client information to parties that are unaffiliated with IPC, unless that information is necessary to provide our products and services to you or its disclosure is otherwise permitted by law. For example, at times we may need to share your information with regulatory agencies, federal, state or local authorities, or credit reporting agencies. These entities are required by law or by contractual obligation to us to maintain the confidentiality of your private information.

These are the commitments IPC makes to you regarding the privacy of your personal information.

### What Information Does IPC Collect?

In the course of doing business with you, we will need to obtain certain personal and confidential information about you. This information can be separated into the following categories:

- **Personal Information** — This information may include, among other things, your name, address, phone number, Social Security number, marital status, spousal information if married, your occupation and employer, your tax bracket, name, address, and Social Security number of your beneficiaries, personal financial information that you provide to us on new account applications or other forms, or any additional information that you wish to share with IPC.
- **Information Regarding Your Account History** — As part of establishing a business relationship with you, we collect and maintain information regarding your investment transactions and other activities that occur

here at IPC. This includes items such as your account balance, payments, withdrawals, account activity, and correspondence with you.

- **Credit and Securities Industry Background Information** — We may obtain a consumer or securities industry report about you upon the opening of your account from a reputable consumer-reporting agency. These reports are used to verify your information, for general risk management decisions, or for any other legitimate business purpose.

### Who May Obtain Your Private Information From IPC?

We do not sell any of the personal information we collect about our potential, current, or former clients. We also do not provide this information to unaffiliated third parties for use in the direct marketing of their own products or services. We will only disclose the information we collect as permitted by law or as requested by you.

# Independent Portfolio Consultants, Inc.



We also may provide the above information to unaffiliated third parties when necessary to facilitate our business relationship with you or as requested or required by regulatory agencies or federal, state, or local authorities. Unaffiliated third parties may include:

- **Service providers**, such as Managed Account Services, LLC, Pershing Advisor Solutions LLC and their clearing agents, and the companies that print your account statements that maintain your information in electronic form so you, your financial advisor and portfolio manager may view your account on-line, and that provide support to money market clients (for example, check printers and debit card vendors).
- **Financial service providers**, such as financial advisors, money managers, money funds, mutual funds, or trust service supporters, should you choose to participate in these types of investments or services.
- **Information providers**, such as consumer credit reporting or securities industry background-checking agencies.
- **Professionals**, such as accountants, tax consultants, and lawyers who may be involved in providing trust, estate, or other financial planning services for you.
- **Regulatory agencies and legal authorities**, such as the Securities and Exchange Commission or other financial industry regulators. These agencies will make official requests from time to time regarding customer accounts and trading activity. When these requests are made, we are obligated to provide them with all requested information. This category may also include the disclosure of information to federal, state or local

authorities, courts or arbitrators, third parties in response to a summons or subpoena, and third parties in compliance with money-laundering or other laws.

The sharing of information with these entities is essential for us to fully service our clients and to satisfy our legal and regulatory obligations. All of these entities are required by law or otherwise obligated to IPC to strictly maintain the confidentiality of your information. In addition, some of these entities may have and provide to you their own privacy policies. If our policy on disclosing information changes, we will promptly notify you in writing.

## How Does IPC Protect The Confidentiality Of Your Personal Information?

We restrict access to nonpublic personal information about you to those employees at IPC who need to know that information. Our employees are bound by a code of ethics requiring confidential treatment of customer information and are subject to disciplinary action if they fail to follow this code. We also maintain physical, electronic, and procedural safeguards that comply with federal and industry standards to guard your nonpublic personal information.

## Who Should I Contact With Questions?

If you have any questions regarding our privacy commitment or require assistance, please call IPC at 800-346-4570 or visit our website at [www.IPCanswers.com](http://www.IPCanswers.com).

