



PRIVATE CLIENT SERVICES™

MEMBER FINRA, SIPC
A Registered Investment Advisor

PRIVACY POLICY

Private Client Services (“PCS”) views protecting its customers’ private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act (the “GLBA”)/Regulation S-P, the firm has instituted the following policies and procedures to ensure that customer information is kept private and secure.

This policy serves as formal documentation of Private Client Services ongoing commitment to the privacy of its customers. All associated persons are expected to read, understand and comply to this policy and to follow all related procedures necessary to uphold the standards of privacy and security set forth by Private Client Services. This Policy as well as the PCS Information Security Policy, are designed to comply with applicable privacy laws, including the GLBA/Regulation S-P, and to protect nonpublic personal information of Private Client Services’ customers.

Scope of Policy

This Privacy Policy applies to all nonpublic personally identifiable information of our current and former customers.

Overview of the Guidelines for Protecting Customer Information

In order to protect customer information the following security standards must be upheld:

- Ensure security and confidentiality of customer records and information;
- Protect against any anticipated threats or hazards to the security or integrity of customer records and information; and
- Protect against unauthorized access to or use of customer records or information that could result in substantial harm or inconvenience to any customer.

Duties of every PCS Associated Person

- Each associated person has a duty to protect the nonpublic personal information of customers collected by Private Client Services.

- Each associated person has a duty to ensure nonpublic personal information of the Private Client Services' customers is limited and shared only with those in a way that is consistent with the firm's [Privacy Policy Notice](#), the procedures contained in this document herein, and our [Information Security Policy](#).
- No associated person is authorized to sell, on behalf of Private Client Services or otherwise, nonpublic information of the firm's customers.
- Unauthorized dissemination of proprietary information and client personal and sensitive data is prohibited and a violation of Regulation S-P. This includes sending client nonpublic information to personal emails. Unauthorized downloading of confidential client information to a removable device (i.e. thumb or zip drive) is prohibited.
- Associated persons with questions concerning the collection and sharing of, or access to, nonpublic personal information of the Company's customers must look to the Company's CCO for guidance.
- Violations of these policies and procedures will be addressed in a manner consistent with other similar PCS disciplinary guidelines.

Information Practices

Private Client Services collects nonpublic personal information from various sources about customers to service and support our business functions. These sources include information provided directly from our customers, information gathered through transactions with PCS through our registered representatives and/or investment advisor representatives, other financial services companies and third parties such as a consumer-reporting agency. Based on the type of product or service our customers apply for or get from us, personal information collected may include name, address, age, social security number or taxpayer ID number, credit history, assets, income, account balances, may be gathered from sources such as applications, transactions, and consumer reports.

Sharing of Personal Information

To serve our customers and service our business, Private Client Services may share certain Personal Information only as allowed by law, with affiliated companies, employees, representatives and administrators. As allowed by law, we may share personal financial information with our affiliates to market our products or services.

We may also share personal information, only as allowed by law, with unaffiliated third parties including financial services firms and/or their representatives or agents (including as discussed under the special situations section below), administrators, and service providers who help us serve our customers and service our business. When allowed by law, we may share certain personal financial information with other unaffiliated third parties who assist us by performing services or functions including marketing our products or services or offering financial products or services under a joint agreement between PCS and one or more financial institutions.

We will not sell or share our customers' Personal Financial Information with anyone for purposes unrelated to our business functions without offering the customer the opportunity to opt out or opt in as required by law. We only disclose personal health information with our customers' proper written authorization or as otherwise allowed or required by law.

Sharing of Personal Information: Special Situations

We recognize our customers' rights to select a financial services representative to provide brokerage, investment advisory and insurance products and services. In connection with the transfer of a representative's registration to another firm, customers' personal information may be shared with their representative and his/her new firm. Customers' personal information shared may include that in which is in custody of our representatives and other personal information necessary to transfer an account, including name, Social Security Number or other tax identification number, address, income, phone number, email address, account numbers and types, and transactions.

In addition, in the event our representatives (or his/her estate) agrees with an unaffiliated representative to sell all or some portion of his/her securities, advisory or insurance business, personal information may be shared with the acquiring representative and his/her financial services firm.

Our customers may prevent any disclosure of their Personal Information by instructing PCS and our representatives not to provide Personal Information in these instances by Contacting: PCS, 2225 Lexington Rd, Louisville, KY 40206, Ph: 502-451-0600.

Opt-out States: If customers live in any state other than California and Vermont that permits them to opt out (or, prevent) disclosure of their Personal Information, and they do not wish their representative to take their data if he/she should sell his/her securities business to an unaffiliated representative or transfer her/his securities registration to another firm, they have the right to opt out of such disclosure. If they wish to prevent sharing of their Personal Information, they may contact us as previously stated.

Opt-in States: For customers who live in California or Vermont, we are required as a financial institution to obtain customer affirmation consent to authorize sharing of their personal information.

Protection of Personal Information

Our employees have access to Personal Information in the course of doing their jobs, such as reviewing transactions, servicing accounts, and informing customers of our products and services. We use manual and electronic security procedures to maintain the confidentiality; and the integrity of personal information we have. We use these various procedures to guard against unauthorized access. Techniques our firm uses to protect personal information include:

- We maintain a secure office and computer environment to ensure that customer information is not placed at unreasonable risk including the use of passwords and firewalls for our computer and information systems.
- We use shredding services/machines, locks and other appropriate physical security measures to safeguard client information stored in paper format. For instance, associated persons are expected to secure sensitive physical client information in locked cabinets when the office is closed.
- We limit employee and representative/advisor access to information only to those who have a business or professional reason for knowing, and only to unaffiliated parties as permitted by law.

- We require anyone to whom we disclose customer personal information to protect its confidentiality and to use it solely for the purpose for which it is disclosed.
- Personally identifiable information about our customers will be maintained during the time they are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws.
- We are responsible for and must: Provide an adequate level of protection for that data; and grant access to protected data only to those people who must use it in the performance of their job-related duties.
- At the start of our relationship, we will give our customers a copy of our current Privacy Notice and thereafter once a year if they maintain a continuing business relationship with us. We will continue to follow our current Privacy Notice regarding Personal Information even when a business relationship no longer exists.