

# First Asset Financial Inc.

## Privacy Policy

### To Our Customers:

At First Asset Financial Inc. (FAF), we are committed to protecting your privacy and the confidentiality of your personal and financial information.

### How We Protect Confidentiality:

FAF provides investment brokerage services by means of its own internal operation and those of its clearing firm and other unaffiliated third party providers such as mutual funds and variable product sponsors. FAF acts as an introducing broker to its clearing firm, which in turn processes the transactions and acts as the account custodian. All of the above named parties receive and maintain information about you that is related to and necessary for processing investment in your account.

Access is permitted only to those individuals within or outside of our organization who need the information to perform their job responsibilities. These companies may receive information about you, but they may only use it for the intended purpose, which is to benefit you. We employ security measures including policies and procedures, computer safeguards, secured files and buildings.

### Persons Covered by the Privacy Policy:

The FAF's Privacy Policy applies to anyone who is a current or former FAF's client, including customers of our correspondent clearing firm. We provide you with a copy of this policy when you open an account and we send you a notification if we change our policy regarding the sharing of information.

### How We Obtain Information About You:

In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as non-public personal information, may be collected from several sources, including FAF, the clearing firm and/or third party Customer Account Applications and other forms you file with us or product vendors as a result of your transactions with us, our affiliates, and non-affiliated third parties such as consumer reporting agencies. FA does not sell your personal information. We provide information about current and former customers from the sources described above to parties outside of our firm only as described below:

-To other companies as necessary to process your business: For example, we process your "direct" mutual fund and variable business through product providers with whom we have dealer-selling agreement. If you have a brokerage

account, the information that we obtain from you is given to the "clearing firm" for purposes of facilitating securities trading and statement preparation. These parties must limit their use of the information to the purpose for which it was provided.

-Where required by law or regulation: Examples include responses to a subpoena, court order or regulatory demand.

-As authorized by you: You may direct us, for example, to send account statements or other account information to a third party.

-As otherwise authorized or permitted by law: For example, the law permits us to respond for a request for information about you from a consumer reporting agency.

We ask that you review your information regularly to ensure that it is correct. Please contact your representative Associated Person (AP) or FAF directly if you need to correct or update your personal information.

### Sharing Information - With Whom and Why:

FAF does not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial services choices. Should your AP change within our firm, your information may be shared with the new AP. Also, if your registered AP leaves our firm, your personal information may be retained by him/her for the purpose of continuing to service your account(s). If you wish to opt-out of having your AP take your personal information upon leaving FAF, please send written request to:

First Asset Financial Inc.

Attn: Compliance Department, 110 E Iron Ave, Salina, KS  
67401

We do not disclose your personal information to non-affiliated third parties unless it is necessary for the purpose of processing your transactions or servicing your account(s). We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with securities regulators or law enforcement authorities, to resolve consumer disputes, or to perform credit evaluations and authenticated checks.

### Option to Opt Out and Change Notices:

If for any reason at any time in the future we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure.