



Privacy Policy & Other Important Information – October 2016

First Asset Financial Inc. is committed to protecting the confidentiality and security of your private investment records and personal information. Our policies and procedures are designed to safeguard your information and to permit only appropriate and authorized access to and use of this information.

In order to carry out the functions necessary to service your investment account, we collect certain nonpublic personal information from you from the following sources:

- Information we receive from you over the telephone, electronic mail and other forms (*e.g.*, your name social security number and address); and
- Information about your portfolio transactions.

We restrict access to your personal and account information to those First Asset Financial Inc. employees and service providers and their employees who need to know that information to service your account. We, along with our service providers, maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

You can be assured that First Asset Financial Inc. considers your data to be private and confidential, and we will not disclose any nonpublic personal information about you to any unaffiliated third parties, except as permitted or required by law or to a firm to which your assigned registered representative is transferring. You are not required to transfer your account to another brokerage firm, but will have the option to do so, if you desire. In order to make such optional transfer as convenient for you as possible, we will share all of the necessary data for account transfer, unless you chose to “opt out” of this service by writing us a note that you do not wish to provide such information to another firm. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

If you have any questions or comments about our privacy practice, please call us at (785) 825-5050 or email us at FAF@firstassetfinancial.com

Notice of SIPC information:

If you desire a copy of the SIPC (Securities Investor Protection Corporation) consumer brochure, you may obtain it:

1. By calling (202) 371-8300 or From SIPC’s web address at www.sipc.org

The Financial Industry Regulatory Authority (FINRA) publishes an investor brochure that describes FINRA BrokerCheck, additionally:

1. The FINRA website address is <http://www.finra.org>
2. The BrokerCheck Hotline Number is (800) 289-9999

BEWARE: Rising interest may negatively affect bonds & bond mutual funds. If you own this asset class talk with your First Asset Financial Advisor to discuss possible actions to take for rising rates.

Business Continuation Plan Disclosure Statement for First Asset Financial Inc. with a Clearing Arrangement through Hilltop Securities Inc.

First Asset Financial Inc.'s Business Continuity Planning

First Asset Financial, Inc. has developed a Business Continuity Plan (BCP) on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (785) 825-5050, you should call our first alternative number (785) 819-1231 or our second alternative number would be (231) 941-4447. If you cannot access us through either of those means, you should contact our clearing firm, Hilltop Securities Inc. (formerly Southwest Securities, Inc.) (866) 797-5227 or view their BCP at <http://hilltopsecurities.com/hilltop-securities-inc-disclosures/business-continuity-plan/> on how Hilltop Securities Inc. may assist you in providing prompt access to funds and securities, enter orders and assist you in processing other trade-related, cash, and security transfer transactions for you.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Hilltop Securities Inc. backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 48 hours. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 48 hours. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our customer emergency number, (785) 819-1231. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (785) 825-5050 or FAF@FirstAssetFinancial.com.

Customer Account Statement:

Be sure to report promptly any inaccuracy or discrepancy in your account or account statement to First Asset Financial Inc. immediately. First Asset is not responsible for any inaccuracy or error committed in the account after 45 days have passed. Also, be sure to re-confirm, in writing, any orally reported inaccuracy to First Asset. Please review your statements carefully when they arrive. All variable annuity applications are reviewed by a designated principal.

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