

# Online Privacy Policy

*Last Updated: April 7, 2018*

**Introduction** – This Online Privacy Policy describes the ways Cetera Financial Group, Inc. (“CFG”) and its affiliates and subsidiaries (collectively, “we”, “us”, “our”, or “Cetera”) collect, use, and protect your information online. By accessing this website or mobile application, you agree to the practices described in this Online Privacy Policy regarding the collection, use, and protection of your information.

Our websites and mobile applications are a great way for financial professionals and customers to find out more about Cetera and use our online services. At Cetera, we are committed to protecting your privacy and security. A summary of how we collect, use, share and secure information obtained through our websites and mobile applications is set forth below.

**Personal Information We Collect** – When you visit or use Cetera’s websites or mobile applications, we may gather certain information using automated means (e.g., cookies and web beacons) including, but not limited to, device identifiers, IP address, browser version and configuration, and operating system details, language preferences and length of visits. We also collect information that you voluntarily input into our websites or mobile applications. For example, if you commence an account enrollment process with one of our affiliates, we may collect the information you provide or authorize us to collect, such as your name, email address, and certain financial information. In addition, if you choose to enroll in online services with one of our affiliates, we may also collect other personal information, such as your full legal name, citizenship, contact information, date of birth, Social Security number and other information that may be used to identify you.

**Cookies** – Cookies are elements of data that a website can send to your browser when you visit that website. Like most commercial website owners, we may use cookies to help you manage your use of our websites. Cookies may be used as follows:

- a. To recognize you as a regular user;
- b. To remind us of your identity;
- c. To track your progress;
- d. To measure and analyze website traffic patterns to understand how our users' habits are similar or different from one another;
- e. To compile statistics on usage patterns; and
- f. To conduct other research.

In addition, we may use information collected online through automated means to track your activity over time and across websites, as well as across different devices you use to access the Internet.

Many web browsers provide options to allow you to stop accepting new cookies, or to disable existing cookies. Please be aware that if you disable the cookies on your computer you may not

be able to use certain features of this website or other websites, and disabling cookies may invalidate opt outs that rely on cookies to function.

**How We Share Your Personal Information** – We may share information with business partners with whom we work, such as affiliates and other companies that help us market products and services to you. In addition, we may permit our agents, vendors, consultants, and other service providers to access information we collect about you through our websites and/or mobile applications to carry out work on our behalf.

Your information may also be disclosed by us to third parties: (1) if we are required to do so by law, regulation, or legal process (such as in response to a court order or subpoena); (2) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity; or (3) in the context of a business negotiation or transaction relating to CFG or any affiliated entity (e.g., further to a merger, reorganization, liquidation, or any other business transaction), including negotiations of such transactions.

**Your Choices** - Keeping your personal information up-to-date is important. If you are a customer of an affiliated broker-dealer in the CFG network, you may update, correct or delete certain contact information by contacting your financial professional. As a customer of an affiliated broker-dealer, you can also learn more about how and why we share your information and your options related to such sharing by reviewing the broker-dealer’s Consumer Privacy Notice (available on your broker-dealer’s website and from your financial professional).

If you are a customer or a financial professional who has enrolled in online services with CFG or one of its affiliates, you can access your account profile, review certain contact information that is stored, and revise that information by signing into your online account.

Additionally, if you are a customer, financial professional or just a visitor, you can unsubscribe from marketing emails sent by CFG by following the unsubscribe instructions included in our emails, [EMAILING US DIRECTLY](#) or [UNSUBSCRIBING HERE](#). Please note that even if you opt out of receiving such communications from us, we may continue to send you non-promotional emails, such as communications regarding our ongoing relationship with you.

**How We Respond to Do Not Track Signals** – Your internet browser may offer what is referred to as a “do not track” configuration that allows your browser to automatically signal your privacy preferences to certain websites that you visit. Industry standards related to this technology continue to evolve, and we have not yet identified a consensus on how to respond to such signals. Therefore, our websites do not currently respond to the “do not track” signals issued by browsers. To learn more about “do not track” signals, you may wish to visit <http://www.allaboutdnt.com/>.

**Links to Affiliate and Non-Affiliate Websites** - You should be aware that linked sites may have their own privacy policies or notices that differ from the provisions provided in this Online Privacy Policy. Your use of linked sites is governed by the privacy policies and terms and conditions of those sites, which we strongly suggest you review.

**Children's Privacy** – We do not knowingly solicit personal information from children under the age of 13 through our websites or mobile applications, and we do not knowingly market to children under the age of 13. If we learn that we have received information directly from a child who is under the age of 13, we will delete the information in accordance with applicable law.

**Security** - Protecting the confidentiality of personal information has been, and will continue to be, a top priority for Cetera. To learn more about the measures that we take to safeguard information that you might share with us, read the complete Internet Security Statement provided below this Online Privacy Policy. Although we use reasonable efforts to safeguard information, transmission via the Internet is not completely secure and we cannot guarantee the security of your information collected through our websites and/or mobile applications.

**Changes to this Privacy Policy** - If we make changes to this Online Privacy Policy, we will revise the "Last Updated" date at the top of this page. Any changes to this Online Privacy Policy will become effective when we post the revised Online Privacy Policy on the applicable website or mobile application. Your use of such website or mobile application following these changes means that you accept the revised Online Privacy Policy.

**Contact Us** - If you have questions regarding this Online Privacy Policy, you may write to us at:

Cetera Financial Group, Inc.  
Attn: Legal Department  
200 North Sepulveda Blvd  
Suite 1200  
El Segundo, CA 90245

**Phone:** 866.489.3100

### **Internet Security Statement**

This Internet Security Statement covers the measures that Cetera takes to help secure your personal information. Cetera maintains a comprehensive Information Security Program based on ISO 27001/27002 and NIST SP 800-53 standards. The program is comprised of administrative, technical, operational and physical safeguards that are designed to protect the personal information of our customers. Some of the core features of the program include:

- Policies, standards, processes and guidelines that govern information technology resources to protect information assets and safeguard personal information
- Technologies such as firewalls, encryption, endpoint protection, intrusion detection, intrusion prevention, Virtual Private Networks, log aggregation and analysis, SPAM Filtering as well as data loss prevention
- Verification of security controls conducted both internally and by independent third parties

- Ongoing internal and external threat and vulnerability assessment and remediation
- 24/7/365 monitoring of our systems and networks to detect weakness and potential intrusions
- Processes executed at consistent intervals, designed to continuously assess and remediate potential security risks
- Continuous identification, assessment and management of enterprise and branch level risk
- Due diligence to manage risk when selecting and retaining external vendors and service providers that help us service your needs
- Ongoing Continuous and mandatory security awareness program for all staff and branch personnel
- Continuous training of staff in financial and technology best practices, products and processes

**Encryption** – Encryption technology is designed to secure personal and confidential communications between your computer and Cetera servers, so that they are protected from being read by any third parties. Cetera’s web and mobile applications require a minimum 128-bit SSL TLS encryption, which is the de-facto industry standard for encrypting and safeguarding websites.

**Sessions and System Inactivity** – All Cetera websites and mobile applications allowing access to client personal information require all users to log in with a user name and password. While you are logged in, if you leave your browser window open, Cetera applications will automatically log you out after a period of inactivity. Similarly, if you close your browser window or mobile application window without logging out, you will be automatically logged out. Both of these measures are designed to protect your information from unintended access by a passerby or different user of your computer.

**Other Security Measures** – Cetera engages in a number of other security activities to help ensure the safety and privacy of your personal information. Cetera’s Information Security Program is comprehensive and is designed to allow our representatives to use the tools and software we provide with confidence.

Note: Due to the ongoing nature of security monitoring, this Internet Security Statement is subject to change without notice to you, so we recommend that you review it regularly.