

The Securities Exchange Commission recently enacted Regulation S-P, the “privacy rule” in response to the Gramm-Leach-Bliley Act. The rule requires all broker-dealer firms to provide all of its customers and consumers a disclosure statement, outlining the firm’s procedures and policies regarding the safeguarding of “non-public personal information” that is obtained during the normal course of business.

Avisen Securities understands your Privacy is important and the firm has always been committed to maintaining your confidentiality. This notice will help you understand what types of nonpublic personal information – information about you that is not publicly available – we may collect, how we use it and how we protect your privacy. We recognize that you expect your personal information to be handled in a professional, confidential manner and we have adopted the following policies to safeguard your privacy and to explain the circumstances under which we may collect, maintain and use any non-public personally identifiable information that you may provide us.

We collect information about you to help us serve your financial needs, provide customer service, offer new products or services, and fulfill legal regulatory requirements. The type of information we collect may include:

- Information we receive from you on applications or other forms (for example, your name, address, social security number, assets and income).
- Information about your transactions with us or others (for example, your account balance, payment history, or parties to transactions).
- Information that we receive from a consumer reporting agency (for example, your creditworthiness and credit history).

We do not share non-public personal information about you with unaffiliated third parties with whom we have no contractual business relationship for their independent use unless (1) you give us permission, (2) it is necessary to complete a transaction on your behalf, (3) it is necessary to protect against fraud, comply with a subpoena or other court order or is otherwise required or permitted by law. We do not sell information about you to outside unaffiliated companies. Because Avisen Securities does not share non-public personal information, it is therefore unnecessary to have an opt-out policy.

Further, we restrict access to your personal and account information to those employees who

need to know that information to provide products or services to you and maintain strict physical, electronic, and procedural safeguards to guard your non-public personal information.

If you decide to close your accounts(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change these privacy policies at any time. You will receive appropriate notice of our Privacy Policy changes.