



# Institutional Securities Corp.

## Corporate Privacy Policy

Institutional Securities Corporation (ISC) is committed to maintaining the confidentiality, integrity, and security of personal information entrusted to us by current and potential financial service customers. We have always treated personal information as confidential and want you to be aware of our privacy policies.

We collect non-public personal information about you from the following sources: information we receive from you on applications or other forms, information supplied by your employer if you are a client through an employer-sponsored retirement plan, and information about your transactions with us, our affiliates or others.

We restrict access to non-public personal information about you to those employees who need to know that information to provide products or services to you. ISC employees are subject to a strict employment policy regarding confidentiality.

We do not disclose any non-public personal information about our customers or former customers to anyone except as permitted by law. We may disclose information to non-affiliated parties as allowed by law, such as responding to a subpoena, prevent-

ing fraud, or complying with an inquiry by a government agency or regulator. ISC may use personal information for the purpose of offering or furnishing products and services. Third parties may be used to help prepare notices of these offerings. However, names and addresses are never given or sold to third parties for any outside use. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your non-public personal information.

We may share your personnel information with our affiliates for business purposes, such as marketing new products and services, servicing your account, and as permitted by law. Our affiliates are companies controlled or under common control of our holding company. The information we share with affiliates may include the information described above (such as name, address, income and information related to your account with ISC).

Disclosure to nonaffiliated third parties: In the normal course of business, personal information may be shared with persons or entities involved in servicing and administering products and services on our behalf, including:

- Financial services institutions, such as mutual fund companies, securities brokers, insurance agencies, clearing brokers, and banks, with whom we have joint marketing agreements (such as agreements to market financial services or products that they jointly offer, endorse or sponsor with us); or
- Companies under contract to perform services for us or on our behalf (such as vendors providing data processing, computer software maintenance and development, transaction processing and marketing services).

We do not retrieve account or personal information from visitors who browse the public (pre-logout) areas of our Web site [www.iscgroup.com](http://www.iscgroup.com). Clients who have the ability to access their accounts online are required to log on with their user name and individually selected password. Your password is known solely to you, the client, and should never be shared with anyone. You may change your password as often as you wish.

Please direct any questions you have regarding this notice to Institutional Securities Corporation at the address or phone number listed below.

## SIPC (Securities Investor Protection Corporation)

Institutional Securities Corporation is a member of SIPC. You can obtain information about SIPC, including a copy of the SIPC brochure by contacting SIPC. You can reach SIPC by telephone by calling (202) 371-8300, or by visiting their website [www.sipc.org](http://www.sipc.org).

## Customer Identification Program Notice

### *Important Information You Need to Know About Opening A New Account*

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person who opens an account. This Notice answers some questions about your firm's Customer Identification Program.

#### **Q. What types of information will I need to provide?**

A. When you open an account, your firm is required to collect information such as the following from you: Your Name, Date of Birth, Address, Identification number.

For US citizens, this is a taxpayer identification number (social security number or employer identification number). For non-US Citizens, this may include a taxpayer identification number, passport number and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you. You may also need to show a driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of

business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, NASD, and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

#### **Q. What happens if I don't provide the information requested or my identity cannot be verified?**

A. Your firm may not be able to open an account or carry out transactions for you. If your firm has already opened an account, they may have to close it.

*We thank you for your patience and hope that you will support the financial industry's efforts to deny terrorists and money launderers access to America's financial system.*