



## **CORPORATE POLICY**

### **PRIVACY OF CLIENT INFORMATION**

Hanseatic works diligently to maintain high standards of confidentiality and to respect the privacy of our client relationships. In that regard we have developed and transmitted a written privacy notice to all of our individual clients who obtain financial products and services from us for personal, family, or household purposes, in accordance with Title V of the Gramm-Leach-Bliley Act of 1999 and its implementing regulations. The privacy notice is based on this corporate policy, which codifies Hanseatic's long-standing practices.

#### **Non-Public Personal Information**

In the course of our business we gather what the recent legislation referred to above terms "non-public personal information" from our clients, primarily through the forms they submit to us. We may also collect information about from introducing brokers (IB), if our clients use them, the executing and clearing brokers, and our affiliated companies. Non-public personal information refers, in our case, to financial-related information we collect that is not readily available to others, as, for example, a telephone number may be from directories.

#### **Our Disclosure Policies**

We do not disclose clients' non-public personal information to anyone, except as permitted by law. This disclosure may include sharing such information with non-affiliated companies that perform support services for client accounts or process client transactions with us. It may include disclosing client information pursuant to their express consent, to fulfill their instructions, or to comply with applicable laws and regulations.

#### **Our Information Security Policies**

We limit access to client information to those Hanseatic employees who are involved in offering or administering the products or services we offer. We maintain physical, electronic, and procedural safeguards that are designed to comply with federal standards to guard client non-public personal information.

If the relationship ends with a client, we will continue to treat the information as described in this privacy policy.