

## Privacy Policy

Apex Clearing Corporation (“Apex”) carries your account as a clearing broker by arrangement with your broker/dealer or registered investment advisor as Apex’s introducing client. At Apex, we understand that privacy is an important issue for customers of our introducing firms. It is our policy to respect the privacy of all accounts that we maintain as clearing broker and to protect the security and confidentiality of non-public personal information relating to those accounts. Please note that this policy generally applies to former customers of Apex as well as current customers.

### Personal Information Collected

In order to service your account as clearing broker, information is provided to Apex by your introducing firm who collects information from you in order to provide the financial services that you have requested. The information collected by your introducing firm and provided to Apex may come from the following sources:

- Information received from you, such as your name, address, telephone number, social security number, occupation, and income;
- Information relating to your transactions, including account balances, positions, and activity;
- Information which may be received from consumer reporting agencies, such as credit bureau reports;
- information relating to your creditworthiness;
- Information which may be received from other sources with your consent or with the consent of your introducing firm.

In addition, Apex may compile aggregate, anonymous, or de-identified data from various sources, including but not limited to accounts and transactions. This data, which Apex may use for its business purposes consistent with applicable law, does not identify individual customers.

### Sharing of Nonpublic Personal Information

Apex does not disclose nonpublic personal information relating to current or former customers of introducing firms to any third parties, except as required or permitted by law, including but not limited to any obligations of Apex under the USA PATRIOT Act, and in order to facilitate the clearing of customer transactions in the ordinary course of business.

Apex has multiple affiliates and relationships with third party companies. Examples of these companies include financial and non-financial companies that perform services such as data processing and companies that perform securities executions on your behalf. We may share information among our affiliates, as permitted by law, in order to better service your financial needs.

### Security

Apex strives to ensure that our systems are secure and that they meet industry standards. We seek to protect non-public personal information that is provided to Apex by your introducing firm by implementing physical and electronic safeguards. Where we believe appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Apex endeavors to ensure that third party service providers who may have access to non-public personal information are following appropriate standards of security and confidentiality. We instruct our employees to use strict standards of care in handling the personal financial information of customers. As a general policy our staff will

not discuss or disclose information regarding an account except with authorized personnel of your introducing firm or as required by law or pursuant to regulatory request and/or authority.

#### **Access to Your Information**

You may access your account information through a variety of media offered by your introducing firm and Apex (i.e. statements or online services). Please contact your introducing firm if you require any additional information.

Apex may use “cookies” in order to provide better service, to facilitate its customers’ use of the website, to track usage of the website, and to address security hazards. A cookie is a small piece of information that a website stores on a personal computer, and which it can later retrieve.

#### **Changes to Apex's Privacy Policy**

Apex reserves the right to make changes to this policy.

#### **How to Get in Touch with Apex about this Privacy Policy**

For reference, this is available on our website at [www.apexclearing.com](http://www.apexclearing.com). For more information relating to Apex’s privacy policy, please contact:

Apex Clearing Corporation  
Attn: Compliance Department  
350 N. St. Paul, Suite 1300  
Dallas, Texas 75201  
214-765-1055