## **Privacy Policy**

## Wealth Enhancement Brokerage Services

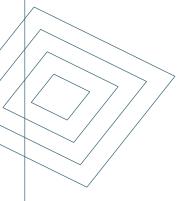
At Wealth Enhancement Brokerage Services, LLC (WEBS), maintaining the trust and confidence of our clients is a high priority. That's why we want you to understand how we protect your privacy as we collect and use your information in order to provide products and services that support your investment needs. We are strongly committed to fulfilling the trust that is the very foundation of your expectations. We have adopted and adhere to the following policy regarding the privacy of our clients' nonpublic personal information.

## How We Collect Information

We collect nonpublic personal information about our clients from some or all of the following sources:

- Information we receive from the completion of our new account form, fact-finding questionnaires and product applications;
- Investment transactions with us, our affiliates, and those product sponsors with whom we have selling agreements or other arrangements for the provision of services to clients;
- · Consumer reporting agencies; and
- Affiliated and nonaffiliated product sponsors whose products are owned by our clients.

The information we collect may include, but is not limited to: your name, address, telephone number, email address, Social Security Number, date of birth, financial account numbers, investment objectives, risk tolerance, employment and income data, and your transaction and investment history.



## How We Use Information

We disclose nonpublic personal information to affiliated and nonaffiliated third parties that provide contracted services in order to more effectively and efficiently service our clients. We ensure contractual restrictions on the affiliated and nonaffiliated third-party use and disclosure of the nonpublic personal information we disclose.

#### These third parties include, but are not limited to:

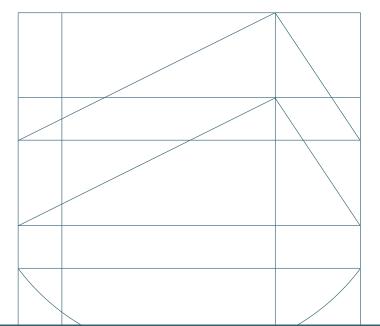
- WEBS affiliated companies, which includes companies related by common ownership or control (such as Wealth Enhancement Advisory Services and other subsidiaries of Wealth Enhancement Group);
- Mutual fund companies, insurance companies and other product sponsors to effect purchases and sales and allow for the servicing of client accounts;
- The carrying broker-dealer through whom we execute and clear securities transactions;
- Banks and other financial institutions with whom we have arrangements for the marketing and sale of our products and services; and
- Companies that provide services to us that assist with the maintenance of required books and records or facilitate mailings on our behalf.
- Regulatory and self-regulatory organizations (e.g., FINRA, SEC, or state securities regulators) as required by law.

We do not disclose your information to nonaffiliated companies who intend to market their products to you. Our policies regarding the collection and use of personal information apply equally to former customers. We do not disclose nonpublic personal information about former customers to anyone, except as permitted by law.

## How We Protect Information

We have established information security practices and procedures to prevent unauthorized use or access to nonpublic personal information. Access to nonpublic personal information is made available to our employees who process or service transactions and fulfill compliance, legal or audit functions. Our computer systems use password protection to prevent access by unauthorized personnel, and we employ other physical, electronic and procedural safeguards to ensure the protection of nonpublic personal information in accordance with state and federal privacy regulations.

WEBS is committed to protecting your privacy in accordance with the Gramm-Leach-Bliley Act (GLBA), applicable SEC and FINRA rules, and relevant state privacy laws.



# "Opt-Out" of Nonaffiliated Third-Party Disclosures

While WEBS does not share your nonpublic personal information with nonaffiliated companies for marketing purposes, if you prefer to limit our sharing of your nonpublic personal information with nonaffiliated third parties (except as permitted by law), you may opt out by sending a Letter of Instruction to the address listed below.

## Questions

If you have any questions about our Privacy Policy, or if you have any questions concerning your account, please contact us at 800-492-1222.

If you prefer, you may write to us at Wealth Enhancement Brokerage Services, LLC, Attn: Compliance, 505 North Highway 169, Suite 900, Plymouth, MN 55441.

We appreciate your business and look forward to serving your financial needs.

