

# Privacy Policy

## Disclosure



Rev. 11/24

<b>Facts</b>	What Do Sigma Financial Corporation (“Sigma”), Parkland Securities, LLC (“Parkland”), and Sigma Planning Corporation (“SPC”) Do With Your Personal Information?
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Financial Information</li> <li>• Investment Objectives and Experience</li> <li>• Account Transactions and Activity</li> <li>• Social Security Number</li> <li>• Other Personal Information</li> </ul>
<b>How?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list (i) the reasons financial companies can share their customers’ personal information; (ii) the reasons Sigma, Parkland, and SPC (collectively, the “Companies” or “we”) choose to share information; and (iii) whether you can limit this sharing.

Reasons we can share your personal information	Do the Companies share?	Can you limit this sharing?
<b>For our everyday business or marketing purposes—</b> such as to process and service your transactions, maintain your account(s), respond to court orders or regulatory and/or legal investigations, report to credit bureaus, perform credit checks, to print and mail your statements, or to offer our products and services to you	<b>Yes</b>	<b>No</b>
<b>For joint marketing with other financial companies—</b> to offer their products and services to you in instances where your representative maintains an agreement with certain banks, credit unions, or other financial institutions	<b>Yes</b>	<b>No</b>
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	<b>Yes</b>	<b>No</b>
<b>For our affiliates’ everyday business purposes—</b> information about your creditworthiness	<b>No</b>	<b>N/A</b>
<b>For our affiliates and non-affiliates to market to you—</b> to offer our products and services to you, or in the event that your representative (i) terminates his or her relationship with one or more of the Companies (or has such relationship terminated by any of the Companies); (ii) transfers his or her affiliation from one of the Companies to another; or (iii) retires or sells his or her book of business to another representative, whether such representative is affiliated with one or more of the Companies or with one of the Companies’ competitors	<b>Yes</b>	<b>Yes</b>

<b>To limit our sharing or for questions</b>	Call us at 734-205-3844 or email: <a href="mailto:privacypolicy@axtella.com">privacypolicy@axtella.com</a> <b>Please note:</b> If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
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<b>Who we are</b>	
<b>Who is providing this notice?</b>	Sigma and Parkland are broker-dealers registered with the Financial Industry Regulatory Authority. SPC is an investment adviser registered with the Securities and Exchange Commission. The Companies are affiliates under common ownership and control.

<b>What we do</b>	
<b>How do the Companies protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How do the Companies collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Open an account</li> <li>• Request investment advice</li> <li>• Sign an investment advisory contract</li> <li>• Give us your contact information</li> <li>• Direct us to buy or sell securities</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other financial companies.</p>

<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more concerning your rights under state law.</p>
<p>What happens when I limit sharing for an account I hold jointly with someone else?</p>	<p>Your choice to limit sharing will not apply for everyone on a joint account. Each account owner needs to separately limit sharing, if applicable.</p>

### Definitions

<p>Affiliates</p>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Our other affiliates include: The Give and DELIVER SPS Family Charitable Foundation, a nonprofit corporation; and Axtella, LLC.</li> </ul>
<p>Non-affiliates</p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Non-affiliates include certain companies owned by your representative; the new broker-dealer and/or investment adviser with which your representative associates in the event his or her relationship with one or more of the Companies is terminated; and another broker-dealer and/or investment adviser designated by your representative if he or she retires and/or sells his or her book of business to another representative.</li> </ul>
<p>Joint marketing</p>	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• Our joint marketing partners include banks, credit unions, retirement plans, and other financial institution programs.</li> </ul>

### Other important information

#### Important Information for AK, CA, MA, ND, VT, and VA customers:

The states of AK, CA, MA, ND, VT, and VA have imposed more restrictive privacy laws than the federal privacy laws. If your account has an AK, CA, MA, ND, or VA address, we will automatically opt you out of sharing your information with non-affiliates for marketing purposes unless you provide us with written approval to do so. If your account has a VT address, we will only disclose your name, address, other contact information, and information about your transactions or experience with non-affiliated third parties with whom we have joint marketing agreements.

#### Broker Protocol

The Companies are signatories to the Protocol for Broker Recruiting (the "Protocol"), a voluntary agreement among broker-dealers and investment advisers. Under the Protocol, neither a departing representative nor the new broker-dealer and/or investment adviser with which he or she associates will have any monetary or other liability to the firm(s) that the departing representative left by reason of taking certain limited customer information and using that information to solicit customers. In connection with the Protocol, and with the exception of customers residing in AK, CA, MA, ND, VT, and VA (see above), the Companies will allow your representative to share your name, address, phone number, email address, and account title(s) with his or her new broker-dealer, investment adviser, and/or successor representative unless you affirmatively choose to opt out of this information sharing. In addition to the information specified in the Protocol, the Companies also permit departing representatives to keep existing records and files pertaining to current and former customer accounts and relationships. However, customers may also affirmatively opt out of this arrangement.

For residents of AK, CA, MA, ND, VT, and VA if you would like your representative to be able to share your name, address, phone number, email address, and account title(s) with his or her new broker-dealer, investment adviser, and/or successor representative for ease in transferring your account(s), as well as to keep your records and files once he or she is no longer associated with the Companies, please see the section entitled "To limit our sharing or other questions" for instructions on how to obtain an opt-in form to permit such information sharing.

**Nevada Residents Only:** This notice is provided to you pursuant to state law. If you would like to be placed on our internal Do Not Call List, please contact our customer service department at 300 Parkland Plaza, Ann Arbor, MI 48103; or click on "Contact Us" at [www.sigma4clients.com](http://www.sigma4clients.com), [www.parkland4clients.com](http://www.parkland4clients.com), or [www.spc4clients.com](http://www.spc4clients.com). Nevada law requires that we also provide you with the following contact information: Nevada Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone 702-486-3132; e-mail: [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).