

Safra Securities LLC, a subsidiary of Safra National Bank of New York, is an SEC-registered broker-dealer and member of FINRA. This document provides important disclosures required by regulation, rule, or law.

## Safra Securities LLC Privacy Policy

SEC Regulation S-P and The Gramm-Leach-Bliley Act require Safra Securities LLC ("SSL"), a registered broker-dealer, to disclose its privacy policy.

Safra Securities LLC is dedicated to protecting your privacy and handling any personal information we receive from you with care and respect. When you use an SSL service, you should understand when and how your personal information is collected, used, disclosed, and protected.

- 1. <u>Safra Securities LLC Privacy Policy</u> In providing financial services to you, we collect certain nonpublic personal information about you. Our policy is to keep this information strictly safeguarded and confidential, and to use or disclose it only as necessary and/or customary in order to conduct our business, provide our services to you, and as otherwise permitted by law.
- 2. <u>Information Collected</u> "Nonpublic personal information" ("NPPI") is individual information about you or your family that is necessary in order to provide any or all of our services to you. Nonpublic personal information may include your name, address, telephone number, employment, income, family members, assets liabilities, investment objectives, and personal financial situation. SSL collects NPPI from sources such as applications, forms or other communications, including electronic communications, and transactions with SSL.
- 3. <u>Information Disclosed -</u> We disclose nonpublic personal information about you only as permitted by law or authorized by you. SSL may use personal information in order to operate our business and service you, such as:

Service and maintain accounts and transactions Verify income and assets

Monitor and archive communications

Verify your identity in accordance with the USA Patriot Act of 2001.

SSL may disclose or share personal information about you to its affiliates, such as banks or investment advisers in order for its affiliates to provide and service accounts and transactions,



such as custodial services, data processing and loan servicing, and to service providers to maintain accounts and transactions. SSL may also share personal information as required by law.

We do not sell your information to any companies so that they may solicit you.

4. **Security Policy** - SSL considers your information to be confidential. Only those individuals who need your information to perform their jobs are authorized to have access to that information. We also maintain physical, electronic, and /or procedural safeguards with respect to your information in order to protect the confidentiality of your information.

We will adhere to the policies and practices described in this notice for both current and former customers of SSL, will assign certain SSL personnel with the responsibility for data privacy, and will inform employees of their privacy responsibilities. If you have any questions regarding our privacy policy, please contact us at 212-704- 5524.

5. Website Privacy Policy of Safra Securities LLC and Safra National Bank of New York -Visitors to the website of Safra Securities LLC and Safra National Bank of New York will remain anonymous. We do not collect personal identifying information about visitors to our site.

Our servers collect standard non-identifying information about visits to the site, such as date and time visited, IP address, city, state, and country. This information is used to compile standard statistics onsite usage. If you have provided personal identifying information via e-mail (such as name and address), the information will only be used to communicate with you to handle your request. It is not sold or transferred to other parties. Safra Securities LLC and Safra National Bank of New York are committed to protecting your privacy. Complaints about either site should be directed to Compliance Department, 546 Fifth Avenue New York, NY 10036 Phone: (212) 704-5524 or e-mail us at sslcompliance@safra.com.