

**1st Global Capital Corp.**, our affiliates and the entire securities industry go to great lengths to protect the privacy of clients' personal financial information. The high marks investors give firms for their services reflect a simple business reality: by putting the interests of our customers first and helping them to succeed, we, in turn, do well.

We think that our ability to share financial information within our company enables us to more effectively serve our customers in several ways. By knowing about investors' finances and goals, we are better informed to make suitable investment recommendations.

We understand the value and importance of keeping our clients' information secure. When customers open accounts, we tell them about our own privacy protections and the different federal laws that also provide safeguards.

The latest and most significant legislation is the Gramm-Leach-Bliley Financial Services Modernization Act, which established four new requirements regarding the use of a consumer's nonpublic personal information. Beginning July 1, 2001, all financial institutions must annually disclose their privacy policy. Customers must be given the right to "opt out" of the use of their nonpublic personal information by a nonaffiliated third party unless the sharing meets certain exceptions.

1st Global Capital Corp. believes it is important for us to have the ability to share information about our clients only if and when it is important. If our brokers are to advise clients effectively about the suitability of certain investments, they must have the best and most complete information available to gauge their clients' financial ability to take risks and determine their long-term financial goals.

## 1st Global's Privacy Policy

### How and Why We Obtain Information

In order to facilitate the servicing of your account, 1st Global Capital Corp. may receive nonpublic personal information about you from your Financial Advisor or from any of the following sources:

- From your applications or forms (examples include name, address, Social Security number, birth date, assets and income)
- From transactional activity in your account (examples include trading history and account balances)
- From other sources with your consent (for example, from other institutions if you transfer positions into an account at 1st Global Capital Corp.)

### How We Protect Your Information

1st Global Capital Corp. has always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We employ extensive information protection controls in keeping with industry standards and practices, and we regularly adapt these physical, electronic and procedural controls to respond to changing requirements and advances in technology.

Within 1st Global, our affiliates and among our service providers, we restrict access to your information to those who require that access in order to provide products and services to you. We may share the personal information that we collect about our customers, prospects or former customers with:

- Affiliates, including 1st Global Advisors, Inc., 1st Global Insurance Services, Inc., 1st Global Retirement Services, Inc. and various 1st Global insurance agencies established under state requirements
- Unaffiliated service providers (for example, fulfillment companies or securities clearinghouses)
- Government agencies and law enforcement officials (as required by law)
- Other organizations, as permitted by the laws that protect your privacy (such as for fraud prevention)
- Other organizations, with your consent

At 1st Global we do not disclose any nonpublic personal information about you, except as permitted by law. You may hear reference to an "opt out" provision at other firms. Since 1st Global and its affiliates do not disclose any nonpublic personal information except as permitted by law, there is no ability to "opt out."

### Privacy Online

1st Global considers privacy, security and service to be just as critical in the online environment as in the rest of our operation. We therefore employ all of the safeguards described above, along with the following Internet-specific practices:

- 1st Global uses a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures.
- If you are a former customer, your information is treated in the same manner as that of current customers.

*This privacy policy applies to 1st Global Capital Corp., member FINRA/SIPC, and all its affiliated companies including: 1st Global Advisors, Inc., 1st Global Insurance Services, Inc., 1st Global Retirement Services, Inc. and other 1st Global insurance agencies as established to meet state requirements.*