

### **Privacy Policy**

| Facts        | What Does the Firm Do   | with Your Personal Information?  |
|--------------|---|--|
| Why?         | 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.        |  |
| What?        | The types of personal information we - Social Security number - Income - Assets  When you are no longer our customer information you provided and share it  | - Investment experience - Account transactions & Risk Tolerance - Retirement assets  -, we will continue to keep the |
| How?         | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons the firm chooses to share personal information and whether you can limit this sharing. |  |
| How<br>Long? | We will retain your personal information as required under applicable law.  However, we may need to hold personal information beyond any retention periods due to regulatory requirements, in response to a regulatory audit, investigation or other legal matter.  |  |

| Reasons We Share Your Personal Information  | Does the Firm<br>Share? | Can you limit this sharing? |
|---|-------------------------|-----------------------------|
| For our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes                     | No                          |
| For our marketing purposes to offer our products and services to you  | No                      | N/A We don't share          |
| For joint marketing with other financial companies  | No                      | N/A We don't share          |
| For our affiliates' everyday business purposes – information about your transactions and experiences  | Yes                     | No                          |
| For our affiliates' everyday business purposes – information about your creditworthiness  | No                      | N/A We don't share          |
| For non-affiliates to market to you   | No                      | N/A We don't share          |

| Questions?                    | (800) 405-8850    |
|-------------------------------|-------------------|
| Who is Providing this Notice: | PFG Advisors, LLC |



| Definitions  |   |  |
|--|---|--|
| How does the firm protect my personal information? | 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.   |  |
| How does the firm collect my personal information? | We collect your personal information, for example, when you:  - Open an account or seek investment advice  - Enter into an investment advisory account  - Apply for insurance  - Tell us about your investment or retirement portfolio  We may also collect your personal information from other financial companies.   |  |
| Why can't I limit all sharing?                     | Federal law gives you the right to limit only: - Sharing for affiliates' everyday business purposes- as it relates to information about your creditworthiness - Affiliates from using your information to market to you - Sharing for non-affiliates to market to you Certain State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.   |  |
| Affiliates   | Companies related by common ownership or control. They can be financial and non-financial companies We do not share with our affiliates except for everyday business purposes to provide products or services to you. Our affiliates include: Priority Financial Group, LLC ("PFG"), PFG Insurance Services (dba of PFG), RIA Partners Group.   |  |
| Non-affiliates                                     | Companies not related by common ownership or control. They can be financial and non-financial companies.  - We DO share with non-affiliates and third parties such as other financial institutions, custodians, service providers related to the provision of investment products or services and to process transactions and maintain accounts. Non-affiliates may have their own record retention policies.  - We do NOT share with non-affiliates and third parties so they can market to you.   |  |
| Joint marketing                                    | A formal agreement between non-affiliated financial companies that together market financial products or services to you:  - We may have an agreement with your financial institution (i.e., bank or credit union) to offer investment services and insurance products to you through our firm. If that financial institution decides to enter into a subsequent agreement with a new investment services provider, we may share your information with that new investment services provider so that your account(s) can continue to be serviced. You can opt out by providing written notice to the address below. |  |



# If your state offers greater protection than federal law, we will comply with the state law requirements. For example, if you are a customer or former customer and your mailing address for your account(s) is in **California**, **Maine**, **Massachusetts**, **New Mexico**, **North Dakota**, or **Vermont**, we will not disclose any non-public personal information about you (except as permitted by law), unless you authorize us to do so. For **California**, please see California Privacy Policy.

## Other Important Information

Keeping state privacy protections in mind, should your <u>independent</u> financial professional (an individual not associated with a financial institution that has an agreement with our firm) terminate from our firm and move to a new firm, and if agreed to by our firm, that financial professional may maintain copies of your personal information to continue to service you at the new firm, unless you complete and return the Exiting Financial Professional Privacy Option form attached to this notice. PFG Advisors is not a member of the Protocol for Broker Recruiting ("Protocol") and the Protocol is only applicable if both the new firm and our firm are members of the Protocol. Other than as required by law, if you do not want our firm to share information with third parties, such as your financial professional's new firm, please complete the form and return to: **PFG Advisors, LLC 3200 Central Avenue, Suite 200 Phoenix, AZ 85012.** 

#### **California Consumer Privacy Act**

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 ("CCPA") regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights. In 2020, the California Privacy Rights Act ("CPRA") amended the CCPA. Both the CCPA and CPRA are collectively referred to as the CCPA in this Privacy Policy.

Most of the personal information that we collect is exempt from the rights provided by CCPA. For example, the rights under the CCPA described below do not apply to personal information collected, processed, or disclosed pursuant to the Gramm-Leach-Billey Act and its implementation regulations or the California Financial Information Privacy Act. As a general matter, those laws apply to nonpublic personal information about individuals who obtain financial products and services primarily for personal, family, or household purposes.

#### Access, Deletion and Correction rights under CCPA

Right to request disclosure of personal information we collect (access rights)

Individuals whose personal information is covered by CCPA have a right to request that we provide the information listed below:

- The categories and sources of personal information that we have collected about you.
- o The categories of sources from which we collected your personal information.
- The business or commercial purposes for which we collected (or sold) the information. We do not sell your personal information.
- The categories of any third parties with which we disclosed your personal information.
- o The specific pieces of personal information we collected over the past year.

Consumers may submit a written request for the following information:

 The categories of personal information, if any, we sold about you, the categories of third parties to which we sold to each type of third party; and

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- The categories of personal information that we have disclosed for a business purpose, and the categories of third parties to whom each category of personal information was disclosed for a business purpose.
- Right to request deletion of personal information we have collected (deletion rights)

Individuals whose personal information is covered by the CCPA may also request that we delete personal information covered by the CCPA that we maintain, subject to certain exemptions. Upon receiving and verifying such requests, we will delete the personal information, unless that information is necessary for us to complete the transaction for which we collected the information; to provide a product or service you requested, or reasonably anticipated within the context of our ongoing business relationship with you; to perform a contract we have with you; to help ensure your security and integrity (e.g., to prevent, detect or investigate data security incidents); maintain the functionality and security of our systems; to comply with or exercise rights provided by the law; or to use the personal information internally in ways that are compatible with the context in which you provided the information to us, among other things. We may also retain information where another exception to the deletion requirements in the CCPA applies.

Right to request correction of inaccurate personal information we have collected (correction rights)

If you determine that we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information, considering the nature of the personal information and the purposes of the processing of the personal information. If we receive a verifiable consumer request to correct inaccurate personal information, we will use commercially reasonable efforts to correct the inaccurate personal information as directed by you. We will consider any documentation that you provide in connection with your right to correct whether provided voluntarily or as required by our firm. We may require you to provide documentation if necessary to rebut our own documentation that the personal information at issue is accurate. We may delete the contested personal information as an alternative to correcting the information if the deletion of the personal information does not negatively impact you or you consent to the deletion.

#### How to exercise Access, Deletion, and Correction Rights

To exercise these CCPA rights, please contact us in writing at PFG Advisors, LLC, 3200 Central Avenue, Suite 200, Phoenix, AZ 85012. You may also submit a request through your Financial Professional.

<u>Verifying Requests</u>: Depending on the nature of your request, we may ask you for additional information to verify your request and identity, including a declaration attesting to your identity, signed under penalty of perjury.

Response Format: Responses to your CCPA requests will be made in writing either by regular mail or email.

<u>Timeline For Responding</u>: We endeavor to respond to a verifiable consumer request within the time periods provided by the CCPA. Typically, we respond within 45 days after its receipt. In certain cases, this may extend to 90 days. If we require more than 45 days, we will inform you or your authorized representative in writing of the reason for the timeline extension. We do not charge a fee to process or respond to your verifiable consumer request, unless it is excessive, repetitive or manifestly unfounded.

<u>Using A Representative</u>: Requests by an authorized representative must include a written, notarized declaration which documents the authorized representative's authority to act on the consumer's behalf. The declaration must certify that (a) the authorized representative is a natural person over the age of 18 or a business entity, (b) the representative is authorized to make a request on behalf of the consumer, and (c) that such authorization is in full force and effect. The declaration must further enclose an authorization to request personal information on behalf of the identified consumer along with a copy of the consumer's valid government-issued photo identification. A declaration must include the sentence "I UNDERSTAND THAT

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#### THE INFORMATION PROVIDED HEREIN IS TO BE RELIED UPON BY PFG, ADVISORS, LLC TO RESPOND TO A

CALIFORNIA CONSUMER PRIVACY REQUEST IN ACCORDANCE WITH THE LAW." An authorized representative must submit the written declaration to PFG Advisors, LLC at the above address. Further the authorized representative must respond to any questions required by PFG, Advisors to verify the consumer's identity. The authorized representative may include, but it is not required, a copy of a valid power of attorney in order for you to use an authorized representative to act on your behalf. Please note that this subsection of the privacy policy does not apply when an authorized representative is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to valid powers of attorney.

PFG Advisors, LLC is committed to the security of your personal information. To protect your personal information from unauthorized access and use, we implement and maintain reasonable security measures that are intended to maintain the confidentiality of personal information. However, no security measures are infallible, and we cannot and do not guarantee that our safeguards will always work. Please use caution when transmitting information over the internet, use of strong and unique passwords are encouraged, and notify us or your Financial Professional immediately of any concerns regarding your account or passwords.