



**PRIVATE  
CLIENT  
SERVICES™**

MEMBER FINRA, SIPC  
A Registered Investment Advisor

# Privacy Policy

Let our independence ignite yours.™

**Collecting Personal Information** - We collect Personal Information to service your transactions with us and to support our business functions. We may obtain personal Information from a variety of sources including you, your transactions with us, your registered representative and/or investment advisor representative (“representative”), other financial services companies; and third parties such as a consumer-reporting agency.

Based on the type of product or service you apply for or get from us, personal Information such as name, Social Security Number or other tax identification number, address, income, payments, or credit history may be gathered from sources such as applications transactions and consumer reports.

**Sharing of Personal Information: General** - To serve you and service our business, we may share certain Personal Information. We will share personal information, only as allowed by law, with affiliates such as: affiliated product companies, employees, representatives, and administrators. As allowed by law, we may share personal financial information with our affiliates to market our products or market our services to you without providing you with an option to prevent these disclosures.

We may also share personal Information, only as allowed by law, with unaffiliated third parties including financial services firms and/or their representatives or agents (including as discussed below under special situations), administrators, and service providers who help us serve you and service our business. When allowed by law, we may share certain personal financial Information with other unaffiliated third parties who assist us by performing services or functions such as marketing our products or services or offering financial products or services under a joint agreement between us and one or more financial institutions.

We will not sell or share your Personal Financial Information with anyone for purposes unrelated to our business functions without offering you the opportunity to opt out or opt in as required by law. We only disclose personal health information with your proper written authorization or as otherwise allowed or required by law.

**Sharing of Personal Information: Special Situations** - We recognize your right to select a financial services representative to provide brokerage, investment advisory and insurance products and services. In connection with the transfer of your representative’s registration to another firm, your personal information may be shared with your representative and his/her new firm. The personal information to be shared may include your personal information in the custody of your representative and other personal information necessary to transfer your account, including name, Social Security Number or other tax identification number, address, income, phone number, email address, account numbers and types, and transactions.

In addition, in the event your representative (or his/her estate) agrees with an unaffiliated representative to sell

all or some portion of his/her securities, advisory or insurance business, your Personal Information may be shared with the acquiring representative and his/her financial services firm.

You may prevent any disclosure of your Personal Information by instructing PCS and our representatives not to provide your Personal Information in these instances by Contacting: PCS Compliance Department, 2225 Lexington Rd, Louisville, KY 40206, Ph: 502-451-0600.

**Opt-in States:** If you live in one of the following states, we are required as a financial institution obtain your affirmation consent to authorize sharing your Personal Information: CO, CT, DE, IN, MT, OR, TN, TX, and VA.

**Opt-out States:** If you live in any state other than California, Iowa, Utah or Vermont that permits you to opt out (or, prevent) disclosure of your Personal Information, and you do not wish your representative to take your data if he/she should sell his/her securities business to an unaffiliated representative or transfer her/his securities registration to another firm, you have the right to opt out of such disclosure. If you wish to prevent sharing of your Personal Information, you may contact us as previously stated.

**Miscellaneous:** Our employees have access to Personal Information in the course of doing their jobs, such as reviewing transactions, servicing your accounts, developing new products, and advising customers of our products and services. We use manual and electronic security procedures to maintain the confidentiality; and the integrity of Personal Information that we have. We use these procedures to guard against unauthorized access.

**Some techniques we use to protect Personal Information include:**

- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- We limit employee and adviser access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law.
- We require anyone to whom we disclose your personal information to protect its confidentiality and to use it solely for the purpose for which it is disclosed.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. We are responsible for and must:
- Provide an adequate level of protection for that data; and
- Grant access to protected data only to those people who must use it in the performance of their job-related duties.
- At the start of our relationship, we will also give you a copy of our current Privacy Notice once a year if you maintain a continuing business relationship with us. We will continue to follow our current Privacy Notice regarding Personal Information even when a business relationship no longer exists between us.