

**Privacy Notice for California Resident Securities America Representatives**

**Effective Date: 1/1/2020**

This Notice is provided on behalf of Securities America Financial Corporation and our affiliates, Securities America, Inc., Securities America Advisors, Inc. and Arbor Point Advisors, LLC (“we”, “our”, “us” and “Securities America”) to advise California residents who are current or former Securities America Representatives and affiliated registered and non-registered branch staff (collectively, “Covered Individuals”) of the types of personal information that we may collect that may be covered by the California Consumer Privacy Act of 2018 (“CCPA”) and the purposes for which we collect such information.

**Information We Collect and How We Use It**

Securities America may collect the following categories of personal information about Covered Individuals for the purpose of carrying out and supporting Representative and/or branch-related functions and activities, including the uses set forth in the table below.

Subject to any applicable limitations under law or collective bargaining agreements, we may collect the following categories of Personal Information about Covered Individuals for the following purposes:

Categories of Personal Information Obtained	Our Uses of Personal Information
<p><b>Contact information and other personal identifiers</b>, such as name, postal address, email address, phone number, unique personal identifier, account name, social security number, driver’s license number, passport number, and similar identifiers.</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Providing client services and operating our business</li> <li>➤ Supervising and providing compliance and licensing-related services and practice support to Covered Individuals</li> <li>➤ Managing and administering compensation</li> <li>➤ Security</li> <li>➤ Conducting internal investigations and ensuring compliance with legal, regulatory and policy requirements</li> </ul>
<p><b>Financial, commercial, and benefits information</b>, such as account information for direct deposits and corporate accounts; information on savings, benefits, retirement accounts; benefits elections and other benefit-related information (including related to leaves); tax information; insurance information; information on investments and financial interests; records of products or services, particularly in connection with corporate travel and events</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Providing client services and operating our business</li> <li>➤ Supervising and providing compliance and licensing-related services and practice support to Covered Individuals</li> <li>➤ Managing and administering compensation</li> <li>➤ Conducting internal investigations and ensuring compliance with legal, regulatory and policy requirements</li> </ul>
<p><b>Internet or electronic activity information and device and online identifiers</b>, such as IP address, online identifier or device IDs, or other similar identifiers; information regarding interaction with a website or application, including time and duration of internet and network connections and how you use Securities America’s technology; browsing history; calls and emails sent and received</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Providing client services and operating our business</li> <li>➤ [Supervising and providing compliance and licensing-related services and practice support to Covered Individuals]</li> <li>➤ Security</li> <li>➤ Conducting internal investigations and ensuring compliance with legal, regulatory and policy requirements</li> </ul>
<p><b>Demographic information</b>, such as date of birth/age, sex, and, citizenship.</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> </ul>

<p><b>Education, professional history and other background information</b>, such as degrees, licenses, certifications, professional designations, training records, continuing education, firm element, work history, job descriptions, annual practice reviews, GDC, discipline, conduct, criminal history, outside business activities, and insurance appointments</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Supervising and providing compliance and licensing-related services and practice support to Covered Individuals</li> <li>➤ Security</li> <li>➤ Conducting internal investigations and ensuring compliance with legal, regulatory and policy requirements</li> </ul>
<p><b>Biometric information</b>, specifically fingerprint information</p>	<ul style="list-style-type: none"> <li>➤ Licensing and registration</li> </ul>
<p><b>Geolocation Information</b></p>	
<p><b>Audio, electronic, visual, or similar information</b>, videos from Securities America events, photographs, voicemail and other telephone recordings</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Providing client services and operating our business</li> <li>➤ Supervising and providing compliance and licensing-related services and practice support to Covered Individuals</li> <li>➤ Security</li> <li>➤ Conducting internal investigations and ensuring compliance with legal, regulatory and policy requirements</li> </ul>
<p><b>Inferences</b> drawn from personal information to create a profile about an individual reflecting, for instance, business development and practice analysis</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Providing client services and operating our business</li> <li>➤ [Supervising and providing compliance and licensing-related services and practice support to Covered Individuals]</li> <li>➤ Managing and administering compensation</li> </ul>
<p><b>Other information on our systems</b>, such as communications or documents Covered Individuals or others store on our systems</p>	<ul style="list-style-type: none"> <li>➤ Recruiting, performance, and practice management</li> <li>➤ Providing client services and operating our business</li> <li>➤ Supervising and providing compliance and licensing-related services and practice support to Covered Individuals</li> <li>➤ Managing and administering compensation</li> <li>➤ Security</li> <li>➤ Conducting internal investigations and ensuring compliance with legal, regulatory and policy requirements</li> </ul>

## Additional Information About Our Uses of Personal Information Regarding Covered Individuals

In addition to the uses set forth above, we may use the categories of Personal Information identified to establish or defend legal claims and allegations and to respond to valid legal requests. For more information on our privacy practices generally, please visit our privacy policy [here](#).

As described in our SAI Compliance Manual, advisors have no expectation of privacy in their use of, or the contents of, company-owned or administered systems or applications, including voicemail, email and other business records or electronic media. Anything that is sent, received, or stored on any company-provided or administered electronic media may be read, listened to, tracked or copied without notice.

## Rights

You have a number of legal rights when it comes to your personal information, including the right to be informed about the personal information we collect and the purposes for which we may use it. Please be aware that consumer rights under certain applicable laws to request access to all personal information we may hold about you and to request that we delete such information do not apply to Representatives and other personnel at this time. You may, however, have other privacy rights. Please contact Securities America at 833-204-5527 for additional information.



## Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at 833-204-5527 or contact [CCPA@saionline.com](mailto:CCPA@saionline.com).

## For Questions

If you have any questions, please contact us by mail at: **12325 Port Grace Blvd, LaVista NE, 68128**, via email at [CCPA@saionline.com](mailto:CCPA@saionline.com) or by phone at **833-204-5527**.

Last Updated: **12/27/19**