

Privacy Policy

- We protect the confidentiality and security of information we collect about our clients.
- We collect nonpublic personal information about clients from the following sources:
 - Information we receive from clients on applications or other forms.
 - Information we receive from clients in response to our “Know Your Customer” enquiries; whether in person, by telephone or electronically. We may verify this information or get additional information from consumer reporting agencies or public sources.
 - Information regarding transactions with us, our affiliates or others, such as account activity or other verifying representations made by you such as your employment, income, liquidity and net worth
 - Information we collect through an Internet "cookie" (an information collecting device from a web server)
- We do not disclose any nonpublic information about clients to anyone, except as permitted or required by law and if authorized by you. For example:
 - Information may be disclosed for audit or research purposes, to attorneys, accountants or other professionals, or to law enforcement and regulatory agencies to help, among other things, prevent fraud or money laundering.
 - Information is disclosed when you direct us to send your account statements and confirms to a third party.
- Our employees are required to protect the confidentiality of information and to comply with our established policies. They may access information only when there is an appropriate reason to do so.
- Employees who violate our Privacy Policy are subject to disciplinary process.
- We also maintain physical, electronic, and procedural safeguards to protect client information.

If clients decide to terminate the relationship with us, we will adhere to the privacy policies and practices as described in this notice.

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

We will provide a Privacy Policy to our clients when they commence doing business with us and on an annual basis thereafter.