

Privacy Statement

At Scottsdale Capital Advisors, protecting our clients' privacy is paramount; we recognize that a customer's financial matters are private and sensitive in nature. Our firm's policies ensure that your privacy is protected and that, at the same time, you are provided with a high level of customer service. We protect all personal data that we collect from you in connection with the services provided by Scottsdale Capital Advisors.

We collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. This non-public information about you may come from the following sources:

- Information we receive from you on applications and other forms;
- Information you give us verbally;
- Information about your transactions with us, our affiliates and others;
- Information we receive from consumer reporting agencies and other entities not affiliated with Scottsdale Capital Advisors; and
- If you visit our web site, information we collect via a web server, often referred to as a "cookie." Cookies indicate where a site visitor has been online and what has been viewed.

We limit access to the non-public personal information of our customers or former customers to those employees, representatives and agents who need to know in order to conduct our business, service your account, and keep you informed. Our employees, representatives and agents are required to maintain and protect the confidentiality of your personal information and must follow established privacy procedures. We maintain physical, electronic, and procedural safeguards to protect your personal information.

In the regular course of our business, we may disclose some or all of the non-public personal information described above with our affiliates and with non-affiliated third parties as necessary to effect, administer, or enforce transactions that you request or authorize, or in connection with processing or servicing a financial product or service that you request or authorize. The non-affiliated third parties with which we may share non-public client information include financial service providers, such as clearing firms, mutual fund companies, investment money managers, and insurance companies with whom we have contracted, and in many cases, with whom the client has contracted as well. Their involvement is essential to the provision of overall service provided by Scottsdale Capital Advisors to its clients. The information shared with these non-affiliated companies is not sold or rented to them, nor is it shared with them for marketing or solicitation purposes. We will share non-public information with non-affiliated companies only when they agree to uphold and maintain our privacy standards when handling a customer's personal information.

In addition, we may disclose non-public information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies, or with attorneys, accountants, or auditors, as necessary to protect our rights and property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

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 and insurance laws. After this required period of record retention, all such information will be archived or destroyed. In all other respects, the information about former clients is treated in the same manner as information about current clients.

We strive to keep our customer records complete and accurate. We will give you reasonable access to information we have about you. Most of this information is contained in account statements that you receive from us and applications that you submit to obtain our products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have any question or concern about your personal information or this privacy notice, please feel free to contact us.

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