

Insigneo Securities, LLC

Privacy Policy

Who We Are

The following business privacy policy has been established and adopted on behalf of Insigneo Financial Group, LLC (“herein after “Insigneo” or the “Firm”). Insigneo Financial Group, LLC comprises a number of operating businesses engaged in the offering of brokerage and advisory products and services in various jurisdictions, principally in Latin America. Brokerage products and services are offered through Insigneo International Financial Services, LLC, headquartered in Puerto Rico, and through Insigneo Securities, LLC, headquartered in Miami. Both are members of the Financial Industry Regulatory Authority (FINRA) and Securities Investors Protection Corporation (SIPC). Investment advisory products and services are offered through Insigneo Advisory Services, LLC, an investment adviser registered with the Securities and Exchange Commission. In Uruguay, advisory services are offered through Insigneo International Asesores de Inversion Uruguay, SA, Insigneo Asesores de Inversion Latam, SRL, and Insigneo Asesores de Inversion de Uruguay, SRL, in Argentina through Insigneo Argentina, SAU, and in Chile through Insigneo Asesorias Financieras, SPA. Collectively, these eight operating businesses make up the Insigneo Financial Group. To learn more about the Broker Dealers including their conflicts of interest and compensation practices, please go to <https://insigneo.com/disclosures/> or via www.finra.org. To learn about Insigneo Advisory Services, LLC and any conflicts related to its advisory services, please see its Form ADV and brochure which can be found at Investment Advisor Public Disclosure website <https://adviserinfo.sec.gov/>.

The Insigneo related entities maintain both common ownership as well as share certain office space and personnel that may be dually associated with referenced entities accordingly. The aforementioned entities conduct in part shared operations thus operate under the collective brand name “Insigneo” and share a number of common clients, although each entity is approved for separate business activities based on location and jurisdiction.

Consumer Privacy Notice

Insigneo believes in protecting the confidentiality and security of information we collect about individuals. This notice describes the privacy policy followed by Insigneo regarding how we treat the

information we receive (“Information”) about individuals who apply for or obtain our products or services (“Individuals”) and the third parties with whom we may share this information.

Information We Collect

In order to service your account(s), Insigneo obtains Public and Non-Public Information from you, and third parties that service your account. This information is collected in order to provide the financial services you have requested. We collect Non-Public Personal Information about Individuals from the following sources:

- Information provided to us directly by an Individual on an application or other forms in connection with our products or services. This may include but is not limited to name, address, telephone number, social security number, occupation, assets, and income.
- Information about an individual’s transactions with us, our affiliates, or others, such as account balance, payment history, parties to a transaction, credit/debit card usage, credit report and insurance policy coverage and premiums
- Information which may be received from consumer reporting agencies, such as credit bureau reports and other Information relating to your creditworthiness; and Information which may be received from other sources with your consent or with the consent of the investment consultant/advisor or clearing broker servicing your account.

Sharing Of Non-Public Information

In connection with servicing your account, your non-public personal information may be shared among entities named in this notice, their affiliates, and non-affiliates who provide services regarding or relating to your account, including transfer agents or other service companies. Our affiliated and any non-affiliated service providers are required to protect the confidentiality of your information and to use the information only for the purposes for which disclosure to them is made. Service providers restrict access to non-public personal information about you to those employees who need to know that information to provide products and services to you.

We, our affiliates, and the service providers we use, maintain physical, electronic, and procedural safeguards to maintain the security of your non-public personal information and disclosure of information about current and former customers. We do not disclose nonpublic personal Information of current or former customers to any third parties except as required or permitted by law, and in

order to facilitate the maintenance of accounts, processing, and clearing transactions in the ordinary course of business.

Protecting Confidentiality and Security

Insigneo treats Information in a confidential manner. Our employees are required to protect the confidentiality of Information maintained by the Firm. Employees may access information only when there is an appropriate reason to do so, such as to administer or offer our products and services. Insigneo strives to ensure that our systems are secure and that they meet industry standards. Our commitment to data security involves monitoring new advances in security technology and enhancing our security architecture to ensure that we provide a high level of privacy for investment services firms and their customers. Where appropriate, we employ firewalls, encryption technology, user authentication systems (i.e., passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Third parties who may have access to such personal Information must also agree to follow appropriate standards of security and confidentiality.

Access to Your Information

You may access your account Information through a variety of media offered by Insigneo and by our clearing Firm or Custodian (i.e., statements or online services). Please contact Insigneo if you require any additional information.

Protection of Your Information

You can help safeguard your personal Information by taking a few simple precautions, which include but are not limited to:

- Do not disclose your account Information, personal identification numbers, passwords, or code words to others;
- Never provide confidential Information to unknown callers;
- When utilizing the internet, be sure to use a secure browser and exit online applications as soon as you finish using them and;
- Ensure your personal computer has virus protection software and never open email from unknown sources.

Changes to This Policy

Insigneo reserves the right to make changes to this policy.

How To Contact Us About This Privacy Policy

If you have any questions after reading this Privacy Policy, please contact us by writing to

Attention: Compliance Department
Insigneo Securities, LLC
1221 Brickell Avenue, PH Floor
Miami, Florida 33131

OR

Telephone: (305) 373-9000

Email: compliance@insigneo.com

Opt Out: Federal law gives you the right to limit information sharing between affiliated entities for marketing purposes. Federal law also requires us to give you this notice to tell you about your choices to limit information sharing for marketing purposes.

You may limit our affiliates from marketing products or services to you based on your personal information that we collect and share with them. To prevent information sharing for marketing purposes, please contact your **Financial Advisor or Insigneo, 1221 Brickell Avenue, PH Floor, Miami FL 33131, Attention: Privacy Officer**. Your choice to limit marketing offers from our affiliates will remain in effect until you tell us to make a change.

No further action is required if you do not wish to limit marketing offers from our affiliates, or if you have already told us about your preferences and do not wish to make a change at this time.

Special Note to EU Residents

Your information is used and stored by Insigneo and its affiliates and service providers in a manner consistent with U.S. laws and regulations. If you do not wish this, please contact your financial advisor to make arrangements to close your account.