

## Privacy Policy

The following business privacy policy has been established and adopted on behalf of INSIGNEO Financial Group. ("INSIGNEO," "us", "we" or "our") is comprised of a family of financial companies that provide a variety of products and services to retail and institutional investors throughout various jurisdictions throughout world. Specifically, INSIGNEO is comprised of two financial industry regulatory authority ("FINRA") member broker-dealers, INSIGNEO Securities, LLC (formerly known as Global Investor Services LP) and Insigneo International Financial Services, LLC (formerly known as Citi International Financial Services, LLC), (1) affiliated Securities Exchange Commission ("SEC") investment adviser, INSIGNEO Advisory Services, LLC (formerly known as Global Investment Advisory Services), (2) affiliated Banco central Uruguay ("BCU") registered Investment Advisors, Insigneo Asesores Latam SA and Insigneo Asesores de Inversion, Uruguay, SA (1) Foreign registered Investment Advisor in Chile, Insigneo Asesorias Financiera SPA, in Chile. The INSIGNEO related entities maintain both common ownership, as well as may 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 in the United States and abroad.

**Consumer Privacy Notice:** INSIGNEO believes in protecting the confidentiality and security of information we collect about individuals. This document 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 form 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 nonpublic personal information may be shared among entities named in this notice and other affiliates, and non-affiliates who provide services regarding or relating to your account, including transfer agents or other service companies. Our affiliates 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 nonpublic 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 nonpublic personal information.

**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

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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 Insigneo International Financial Services, LC by writing to c/o Compliance Department, INSIGNEO, Parque Las Americas 1 235 Federico Costa Street suite -101, San Juan, Puerto Rico PR 00918 United States. or contact Compliance at [moises.valladares@insigneo.com](mailto:moises.valladares@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 adviser or Insigneo International Financial Services, Parque Las Americas 1, 235 Federico Costa Street suite -101, San Juan, Puerto Rico PR 00918 United States Attention: Compliance 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.