

HIGHTOWER NOTICE OF PRIVACY POLICY

This policy is designed to protect the privacy and security of the personal information we obtain from clients. To service your account adequately, we must collect and maintain certain confidential information about you. In accordance with the laws, regulations and rules we are governed by, we are providing this Privacy Policy Notice to all new and existing customers.

INFORMATION WE COLLECT FROM YOU

We collect certain nonpublic personal identifying information about you (name, address, social security number, date of birth, income, assets, investment preferences, etc.) from information that you provide on applications or other forms, as well as communications (electronic, telephone, written or in person) with you or your authorized representatives. We collect information about your accounts and transactions (such as purchases, sales, account balances, inquiries, etc.), information to process transactions or to conduct online transactions. If you apply for life insurance, we may receive information on your health or habits.

INFORMATION FROM THIRD PARTIES

If needed, we may obtain information from third parties to evaluate your application or verify your identity, including personal and credit information from consumer reporting agencies, or information from other companies about contracts or accounts transferred to us.

MEDICAL INFORMATION

We only collect medical information required to underwrite life insurance or annuity products. We will obtain written consent from you before we obtain this information from third parties. Such information is not shared for marketing purposes.

INFORMATION WE SHARE

We share information only in a limited way to conduct business and provide service to customers, or as required by law. The law allows us to share the personal information listed above with our affiliated firms, also known as our family of companies. We share this information to conduct routine business activities. These parties are prohibited from using or sharing the information for any other purpose, including marketing, and they are required by contract to maintain the confidentiality of your information.

WHAT INFORMATION WE DISCLOSE

We do not disclose your nonpublic personal information except: (i) in furtherance of our business relationship with certain providers necessary to effect transactions and services (broker-dealers, custodians, Money Managers, etc.); (ii) regulatory bodies; (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. If you either terminate our services or become an inactive customer, we

will continue to adhere to our privacy policy, as may be amended from time to time.

SAFEGUARDING OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees servicing your account. We train our employees to keep your information safe and confidential. We maintain physical, electronic and procedural safeguards that comply with applicable federal and state standards.

CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may change from time to time. We will provide you notice of material changes, and this notice is posted on our website, Hightoweradvisors.com.

WITHIN OUR FAMILY OF FIRMS

This Privacy Policy Notice applies to our affiliated companies including: HighTower Holding, LLC; HighTower Securities, LLC; and HighTower Advisors, LLC.

OPTING OUT OF THIRD PARTY DISCLOSURES

If you prefer that HighTower not disclose the nonpublic personal information about you to non-affiliated third parties, you may opt of such disclosures – that is, you may direct us to not make those disclosures, other than those permitted by law. If you wish to so opt out, you may contact our Compliance Department at 312-962-3800, or send a written request to the firm address below. Please note that if you opt out, it may affect HighTower's ability to service your account adequately.

FINANCIAL ADVISOR TRANSITION OF EMPLOYMENT

If your financial advisor ends their affiliation with HighTower, they may be permitted to use limited information to contact you to solicit you for their new firm, and as a means to continue to service and maintain your account. The information they are permitted to use is limited to your name, address, email address, phone number and account title.

FOR QUESTIONS, PLEASE CONTACT US

ATTN: Compliance ♦ HighTower ♦ 200 West Madison Street, Suite 2500 ♦ Chicago, IL 60606 ♦ 312.962.3800 ♦
Compliance@HighTowerAdvisors.com

For a copy of HighTower's most recent Form ADV, Privacy Policy, or to make changes to your financial situation or investment objectives, please contact your Financial Advisor.

03/2020



HIGHTOWER
well-th. rebalanced.