

## **HIGHTOWER NOTICE OF PRIVACY POLICY**

We have adopted this policy with the recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. To service you in an accurate and efficient manner, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information. The rules and regulations applicable to our business require us to provide this Privacy Policy Notice to all new and existing customers.

### **Defining Personally Identifiable Information**

Various laws and regulations use different terms and definitions for information about individuals that is personal and should be protected. Some laws and regulations consider only very limited types of information to be protected and private. Others include much broader categories.

At Hightower, we have chosen to adopt a broad approach in determining what information must be protected and kept as private as possible. In this notice, "Personally Identifiable Information" (PII) refers to data that could be used, alone or in combination with other data, to identify you as an individual. It can include name, physical address, email address, IP address, date of birth, social security number, passwords, credit card or other financial or payment information, and more.

### **Purposes for Collecting PII**

We collect your PII for a variety of purposes including:

- We may use this information to provide investment advisory services to you, which services may include assisting you with custodial account opening documentation;
- For our everyday business purposes such as to process your transactions, develop your investment profile, and maintain your accounts(s);
- To process a transaction for your account, or otherwise in furtherance of our business;
- The performance of our obligations under your agreement(s) with us (including all applicable anti-money laundering, know your customer and other related laws, rules and regulations);
- For our marketing purposes in order to offer our or other financial companies' products and services to you;
- For our affiliates' everyday business purposes, including certain information about your transactions, experiences, and investment profile;
- The ongoing administrative, accounting, reporting and other processes and communications required to operate the business in accordance with your agreement(s) and other related documentation;
- Any legal or regulatory requirement to which our business is subject; and
- Any other purpose of which you have been notified, or has been agreed, in writing.

### **Legal Basis**

There is a need to process PII for the purposes set out in this Privacy Policy Notice as a matter of contractual necessity under or in connection with your agreement(s) with us, and in the legitimate interests of Hightower [and its affiliates] to operate their respective businesses. From time to time, Hightower may

need to process the PII on other legal bases, including: (1) to comply with a legal obligation; (2) if necessary to protect the vital interests of a client or other data subjects; or (3) if necessary for a task carried out in the public interest. For the purposes listed above, Hightower is relying on performance of a contract necessity and legitimate interests.

A failure to provide the PII requested to fulfill the purposes described in this Privacy Policy Notice may result in Hightower being unable to provide the services in connection with the terms of your agreement(s) with us.

### **Information We Collect from You**

We collect certain nonpublic personal identifying information about you (such as your 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 (such as your attorney, accountant, etc.). We also 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 also obtain information from third parties. We may combine the information received about you from such third-party sources with the PII we collect directly from you. For example, we may obtain information from you 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 to submit to an insurance company to underwrite life insurance or annuity products. We will obtain written consent from you before we obtain this information from third parties. We only share medical information within strict limits as allowed or required by law; such information is not shared for marketing purposes.

### **Information We Share**

We do not and will not sell your PII. If we share your PII with third parties performing services for us, or acting on our behalf, we will not allow them to use your information for other purposes, and we will contractually require them to protect your information. 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.

### **What Information We Disclose**

We do not disclose the nonpublic personal information we collect about you to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to affect the transactions and provide the services they provide (such as broker-dealers, custodians, money managers, etc.); (ii) to persons assessing our compliance with industry standards (*e.g.*, regulators); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. No nonpublic personal information is provided to outside firms for marketing purposes. We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third

parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited from using or sharing the information for any other purpose, and they are required by contract to maintain the confidentiality of your information. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as amended from time to time.

### **Safeguarding of Your Information**

We restrict access to your nonpublic personal information to those employees who need to know that information to service 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 any material change we make, and you will also receive a copy of this notice once every 12 months.

### **Within Our Family of Firms**

All procedures in this Privacy Policy Notice apply to our family of 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 out 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 provided below.

**The following applies only to residents of the State of California:**

### **The California Consumer Privacy Act and Your Personal Data Rights**

The California Consumer Privacy Act (“CCPA”) requires us to make certain additional disclosures and provides California residents with the ability to request additional information about their PII. If you are a California resident and it is determined that the CCPA applies to you, this section details those rights, how you may exercise them, and what Hightower will do in response.

Please note that the rights under the CCPA do not apply to PII collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

If you are an individual who resides in California and whose personal data is collected and processed by Hightower, you may have the right to:

- Request that we disclose, free of charge, the categories and specifics of the PII we collect about California residents, the sources from which the PII was collected (and/or, if applicable, the extent to which PII is sold or otherwise disclosed to a third party), and the business purpose for collecting PII.

- Choose to opt-out of the sale of personal information. Currently, however, Hightower does not sell personal information.
- Request that we delete the PII we have collected. Following our verification of the request, we will comply with the request and delete any or all PII in our possession that we collected from the California resident and/or any or all such PII in the possession of our service providers, unless otherwise restricted by law or regulation.

### **Non-Discrimination for Exercising Your PII Rights**

We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this Privacy Policy Notice.

### **Verifying Your Identity**

If you choose to contact us with a request, you will need to provide us with identifying information that matches the PII we currently have about you. For example, we may require identifying documents such as (Driver’s license, Passport, or military ID).

### **Authorized Agent**

You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact 888.587.2999 or [dataprivacyrequest@Hightoweradvisors.com](mailto:dataprivacyrequest@Hightoweradvisors.com)

### **Accessibility Information**

For consumers with disabilities who need to access this policy in an alternative format, please contact 888.587.2999 or [dataprivacyrequest@Hightoweradvisors.com](mailto:dataprivacyrequest@Hightoweradvisors.com)

**The following applies only to residents of the European Union (EU), transmitting data from within the EU:**

### **Transfers of PII**

We may transfer the PII we collect about you to countries outside the EEA for the purposes outlined in the Purposes for Collecting PII section. Those countries may not have the same standard of data protection laws as the EU. Where this is the case, we will put in place appropriate safeguards such as the EU-approved standard contractual clauses to ensure that your PII is treated in a manner that is consistent with and respects the EU laws on data protection. If you require further information you can request it from 888.587.2999 or [dataprivacyrequest@Hightoweradvisors.com](mailto:dataprivacyrequest@Hightoweradvisors.com).

### **The General Data Protection Regulation and Your Personal Data Rights**

The European Union’s General Data Protection Regulation (GDPR) is a sweeping piece of legislation that grants EU residents increased control over their personal data.

The GDPR allows consumers to access their personal data and find out details of how that data is processed, to rectify inaccurate personal data, to have their data erased (when certain conditions are met), to restrict processing of their data, and more. It requires affected companies to create processes to comply with and facilitate consumer data requests, to update their privacy policies, and to ensure that personal data is secured.

This Privacy Policy Notice provides the details you need to understand your rights under the GDPR, and to exercise those rights. It provides you with the contact information you need to

take action regarding the privacy of your data.

#### Your Data Subject Rights

The GDPR and other national privacy laws provide data subjects with certain rights regarding their personal data.

If you are an individual who resides in the EU and whose personal data is collected and processed by Hightower, you have the right to:

- Request access to your data;
- Rectify your data;
- Take your data (in a readable, “portable” format) to another service provider;
- Erase your personal data;
- Restrict or object to the processing of your personal data;
- Lodge a complaint with a Member State Supervisory Authority; and
- Withdraw previously given consent to collect and process personal data (which will not impact personal data processed before the withdrawal).

#### **For Questions, or to Exercise your PII Rights, Please Contact Us**

ATTN: Chief Compliance Officer  
Hightower 200 West Madison Street, Suite 2500  
Chicago, IL 60606  
888.587.2999 or  
[dataprivacyrequest@hightoweradvisors.com](mailto:dataprivacyrequest@hightoweradvisors.com)

If you would like a copy of Hightower’s most recent Form ADV or have changes to your financial situation or investment objectives, please contact your Financial Advisor.



**HIGHTOWER**  
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