

# Privacy Policy

## Who We Are

“Insigneo” and “Insigneo Wealth” are brand names used by Insigneo Financial Group, LLC and its affiliates, including Insigneo Securities, LLC, a broker-dealer registered with the U.S. Securities and Exchange Commission (“SEC”) and a member of [FINRA](#) and [SIPC](#), and Insigneo Advisory Services, LLC, an SEC-registered investment adviser. These affiliated entities maintain common ownership, may share office space and personnel, and often serve the same clients to provide a coordinated client experience. However, each entity operates pursuant to its own regulatory approvals and is authorized to conduct only those activities permitted within its respective jurisdiction. To learn more about Insigneo’s legal entities, visit <https://insigneo.com/insigneo-legal-entities/>.

Insigneo is committed to protecting the confidentiality, integrity, and security of non-public personal information collected in connection with its brokerage and advisory services. This notice describes Insigneo’s privacy practices regarding how such information (“Information”) is collected, used, and shared for individuals who apply for or obtain products or services (“Individuals”), including the circumstances under which Information may be shared with affiliated and non-affiliated third parties in accordance with applicable law.

## Information We Collect

To open, service, and maintain your account(s), Insigneo collects public and non-public personal information from you and from certain third parties that service your account or support our business relationship with you. We collect this information to provide the financial products and services you request and as otherwise permitted or required by law.

**Cookies and Online Tracking:** If you visit our websites or use our online services, Insigneo may use cookies and similar technologies to support essential operations, security, preferences, analytics, and related website functions. These technologies may collect device identifiers, browser information, IP address, and website interaction data, which may be treated as personal information under applicable law. More information about these technologies and your choices is provided below.

- **Information You Provide:** Information you provide to us on applications, questionnaires, account forms, or in other communications in connection with our products or services, such as your name, address, telephone number, Social Security number or taxpayer identification number, occupation, assets, and income.
- **Transactional Information:** Information about your transactions and experiences with us, our affiliates, or others, such as account balances, transaction history, payment history, and parties to transactions.
- **Consumer Reporting Information:** Information we receive from consumer reporting agencies, such as credit reports and other information relating to your creditworthiness, where permitted by law.
- **Information from Other Sources:** Information we receive from other persons or entities in connection with servicing your account or with your consent, where applicable.

## Sharing of Non-Public Information

In connection with servicing your account, processing transactions, maintaining your relationship with us, and as otherwise permitted or required by law, we may share non-public personal information with the entities identified in this notice, their affiliates, and certain non-affiliated third parties.

The table below summarizes the categories of information sharing described in this notice.

Reasons we can share personal information	Does Insigneo Share?	Can you limit this sharing?
<b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
<b>For our marketing purposes</b> —to offer our products and services to you.	Yes	No
<b>For joint marketing with other financial companies</b> — to offer complementary financial products.	Yes	No
<b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences.	Yes	No
<b>For our affiliates to market to you</b> —using information we share with them to market their products or services to you.	Yes	Yes (Opt-Out)
<b>For non-affiliates to market to you</b> —sharing your information with outside companies so they can market to you.	No	We don't share

**Note on Service Providers:** We may disclose information to affiliated and non-affiliated service providers, such as transfer agents, custodians, clearing firms, and other vendors that support our business operations, in connection with servicing your account or as otherwise permitted by law. These parties are required, by contract or other appropriate arrangements, to protect the confidentiality and security of the information and to use it only for authorized purposes.

## How to Limit Our Sharing (Your Right to Opt-Out)

Federal law gives you the right to limit certain information sharing among affiliated companies for marketing purposes. Specifically, you may opt out of our affiliates using information we share with them to market their products or services to you, to the extent permitted by applicable law.

To exercise this, opt-out right, please contact us using one of the following methods:

- **By Email:** Send an email to [compliance@insigneo.com](mailto:compliance@insigneo.com) with the subject line "**Privacy Opt-Out Request**" and include your account name(s).
- **By Mail:** Mail a written request to:

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

If you choose to opt out, please allow up to 30 days for us to process your request. Once your opt-out election is processed, it will remain in effect until you tell us to change it. If you do not opt out, or if you have already told us your preference, no further action is required.

## **Protecting Confidentiality and Security**

Insigneo treats non-public personal information as confidential. Access to customer information is limited to employees and authorized personnel who need the information to provide products or services, service accounts, comply with legal or regulatory obligations, or otherwise support legitimate business functions. We maintain these practices in accordance with applicable U.S. law and regulation with respect to accounts supported by Insigneo Securities or Insigneo Advisory Services.

We maintain administrative, technical, and physical safeguards designed to protect customer information against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer.

- Our safeguards include measures such as access controls, user authentication, encryption, and network security protections designed to help protect customer information.
- We periodically review and enhance our information security measures in light of changes in technology, business operations, threats, and legal or regulatory requirements.
- We maintain a written Incident Response Program designed to detect, respond to, and recover from unauthorized access to or use of customer information. Our program includes procedures for assessing, containing, investigating, remediating, and documenting security incidents, and for providing notifications as required by applicable law.

Service providers and other third parties that receive customer information in connection with servicing your account are required, by contract or other appropriate arrangements, to protect the confidentiality and security of that information and to use it only for authorized purposes.

## **Access to Your Information**

You may access information about your account through secure channels made available by Insigneo, our clearing firm, or your custodian, including account statements and secure online portals, where applicable. Please contact your investment professional or the Compliance Department if you need assistance.

## **Cookies and Online Tracking**

Insigneo uses cookies and similar technologies on its public website for essential operations, security, preference management, analytics, and related online service functions. These technologies may include session cookies, persistent cookies, local storage, pixels, and similar identifiers, and may collect device identifiers, browser information, IP addresses, and website interaction data.

Some of these technologies are provided by third parties that support hosting, security, analytics, media, or website functionality. Where required by applicable law, non-essential cookies are not used until the required

consent is obtained. You may accept, reject, or manage your preferences through the cookie banner or Cookie Settings tool, and you may also be able to manage certain cookies through your browser settings, although doing so may affect website functionality. Where applicable law provides rights to opt out of sale, sharing, or targeted advertising arising from cookie-based processing, those rights may be exercised through the methods described in this notice or through website controls made available for that purpose. Retention periods vary by function and are reviewed periodically.

### **Protecting Your Information (Client Best Practices)**

- You can help protect your personal information by taking the following precautions:
- Do not share your account information, personal identification numbers (PINs), passwords, or security codes with others.
- Do not provide personal or financial information in response to unsolicited phone calls, text messages, emails, or other communications unless you have verified the sender or caller.
- When accessing online services, use secure connections, enable multi-factor authentication where available, and sign out after completing your session.
- Keep your personal devices and software up to date, and do not open attachments or click links from unknown or unverified sources.

### **Special Note to European Union (EU) Residents**

If you are a resident of the European Union, your personal information may be transferred to, processed in, and stored in the United States by Insigneo, its affiliates, and service providers in connection with your account and the services we provide. Where required by applicable law, non-essential cookies and similar technologies are used only after consent is obtained, and you may withdraw or change your cookie preferences at any time through the website controls. If you do not want your personal information to be processed in the United States in connection with your account, please contact your investment professional to discuss account closure.

### **Special Notice to California Residents**

If you are a California resident, you may have additional privacy rights under California law. California law may limit a financial institution's ability to share nonpublic personal information with certain nonaffiliated third parties unless an exception applies and may provide additional choices regarding certain affiliate sharing. Information collected through cookies and similar technologies may also be treated as personal information and, where applicable, may be subject to rights relating to access, deletion, correction, and opt-out of certain sharing or targeted advertising activities. Where required, we will provide any additional California privacy notice or choice form describing those rights and how to exercise them.

### **Special Notice to Canadian Residents**

If you are a resident of Canada, including the Province of Québec, your personal information will be collected, used, disclosed, retained, and protected in accordance with applicable Canadian privacy laws, including the

Personal Information Protection and Electronic Documents Act ("PIPEDA") and, where applicable, substantially similar provincial privacy laws, including Québec's private sector privacy law. We collect, use, and disclose personal information for purposes related to establishing, maintaining, and servicing your account(s), providing products and services you request, complying with legal and regulatory requirements, preventing fraud, protecting the security and integrity of our systems and records, and as otherwise permitted or required by applicable law.

Your personal information may be transferred to, stored in, or processed in the United States or other jurisdictions outside your province or territory of residence in connection with the services we provide and the operation of our business. When information is transferred outside Canada or outside Québec, as applicable, it may be subject to the laws of the jurisdiction where it is processed, including lawful access requirements imposed by courts, law enforcement, or regulatory authorities. We use contractual, administrative, technical, and physical measures designed to help protect personal information in the custody or control of Insigneo and information processed on our behalf by service providers.

Subject to applicable law and verification of identity, Canadian residents may request access to personal information we maintain about them and may request correction of inaccuracies in that information. To submit a privacy-related request, ask a question about our privacy practices, or make a complaint, please contact our Compliance Department using the contact information in this notice. We will review and respond to requests and complaints in accordance with applicable law. If you are not satisfied with our response, you may have the right to contact the Office of the Privacy Commissioner of Canada or, if you are located in Québec and applicable law so provides, the Commission d'accès à l'information du Québec.

## **Changes to This Policy**

We may amend this notice from time to time. If our information-sharing practices change in a way that requires notice under applicable law, we will provide you with a revised notice as required.

## **Contact Us**

If you have questions about this notice, please contact:

**Insigneo Securities, LLC**  
**Attention: Compliance Department**  
**1221 Brickell Avenue, PH Floor, Miami, Florida 33131**  
**Email: [compliance@insigneo.com](mailto:compliance@insigneo.com)**