

## PRIVACY POLICY AND PRACTICES OF COMMONWEALTH FINANCIAL NETWORK®

COMMONWEALTH FINANCIAL NETWORK® THROUGH ITS NETWORK OF INDEPENDENT REGISTERED REPRESENTATIVES, DISTRIBUTES A VARIETY OF FINANCIAL PRODUCTS AND SERVICES TO YOU. WE HAVE ALWAYS VALUED THE TRUST OUR CUSTOMERS HAVE PLACED IN US AND ARE COMMITTED TO THE RESPONSIBLE MANAGEMENT, USE, AND PROTECTION OF OUR CUSTOMERS' PERSONAL INFORMATION. WE ARE PROUD OF OUR PRIVACY AND CONFIDENTIALITY PRACTICES, AND WE WANT YOU TO KNOW HOW WE PROTECT YOUR INFORMATION AND USE IT TO SERVICE YOUR ACCOUNT(S).

Please take a moment to review our privacy policy, as described below. If you deal with us through an independent registered investment advisor, please also review your advisor's related privacy policy.

### GATHERING INFORMATION

Commonwealth collects personal information about you to help us serve your financial needs, process transactions in your account(s), provide customer service, offer new products or services, and fulfill legal and regulatory requirements.

Commonwealth collects nonpublic personal information from you, as well as from other sources. The sources and the information collected may include:

- Information you provide to us, to our affiliated entities, or to your registered representative on applications and related forms, through discussions with our customer service staff, or on our website, such as address, social security number, birth date, net worth, assets, income, and medical information, if applying for insurance
- Information regarding your transaction history with us, such as products or services purchased, account balances, trading history, and payment history, as well as information from information service companies and consumer reporting agencies, such as your transactions or credit relationships with unaffiliated third parties
- Information from other unaffiliated third parties, including employers, associations, benefit plan sponsors, and other institutions, if you transfer positions or funds to Commonwealth, such as address, social security number, net worth, assets, and income

### SHARING INFORMATION

We may disclose any of the nonpublic personal information that we collect about you, as required to conduct our business and as permitted or required by law. We may share information about our customers with our affiliated investment advisor and/or with unaffiliated financial or non-financial services providers, such as insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing account maintenance or customer service to your account(s). We also may share your information with regulators and law enforcement organizations, or in response to a subpoena or discovery request, as permitted or required by law.

*We do not sell, share, or disclose your nonpublic personal information to unaffiliated third-party marketing companies.*

If the representative servicing your account(s) leaves Commonwealth to join another broker/dealer, the representative may retain copies of your personal information so that he or she can continue to serve you at the new firm. In doing so, your representative may share your information with the new firm, but is otherwise required to keep confidential the personal information obtained from you while the representative was affiliated with Commonwealth, and he or she may only use it to service your account(s).

### **Opting In**

If you live in an “opt-in” state, where we are required to obtain your affirmative consent to share your nonpublic personal information with unaffiliated third parties who do not currently assist us in servicing your account, we will obtain your consent before we allow your representative to take your information with him or her should your representative leave Commonwealth. **Please note:** You can withdraw your consent at any time, by contacting the Compliance department at 800.251.0080, x9603.

### **Opting Out**

If you live in an “opt-out” state and do not want your representative to take your information with him or her should your representative decide to leave Commonwealth in the future, you have the right to opt out of such disclosure. If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers. If you wish to opt out, now or at any time in the future, please contact our Compliance department at 800.251.0080, x9603.

### **SAFEGUARDING PRIVACY**

Commonwealth recognizes the need to prevent unauthorized access to the information we collect,

including information held in electronic format.

Commonwealth authorizes access to your nonpublic personal information only to personnel who need that information to serve you. We maintain physical, electronic, and procedural safeguards regarding your nonpublic personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

### **QUESTIONS**

You do not have to contact us to benefit from Commonwealth’s privacy protections; they apply automatically to all of our customers and former customers. If you have any questions after reading this privacy policy, however, we encourage you to contact your registered representative or to write to Privacy Management, c/o Legal Department, Commonwealth Financial Network, 29 Sawyer Road, Waltham, MA 02453-3483.