



## *Stifel Consumer and Online Privacy Policy*



### **Protecting Your Privacy — Our Pledge to You**

Stifel Financial Corp. and our affiliates\* believe the opportunity to help you meet your financial objectives is a great privilege and carries with it a great responsibility.

Protecting the confidential information of our current and former clients is very important to us. With this in mind, Stifel Financial Corp. and all our affiliates will be governed by the following privacy principles.

***Stifel***  

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PRESTIGE<sup>®</sup> ACCOUNTS

## **1. Your privacy is a top priority.**

As we work together, you often entrust us with personal and financial information, such as your name, address, occupation, assets, income and debts, and tax information. In the case of insurance products, you may also entrust us with health information. We use information given by you to provide products and services to you, to help you achieve your financial goals, and to communicate better with you. We promise to protect the security, privacy, and use of your personal and financial information, including account and transaction details.

We may collect information from you in person, on the telephone, through regular mail, or through electronic means, such as sending Stifel an e-mail message or requesting services through the Stifel web site. Stifel does not collect any personal information from anyone who is merely visiting or browsing our web site.

## **2. Opening a new account at Stifel Nicolaus.**

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means to you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## **3. The products and services you use are delivered in a secure environment.**

When you use the Internet to access your Stifel account, you can feel confident that we use security measures that are appropriate to protect personal and financial information.

## **4. Keeping your personal information accurate and current is a vital concern.**

We strive to keep your personal and financial information accurate. If you believe that our records are incorrect or out of date, please notify us. We will make any necessary corrections quickly.

## **5. Employee access to your information is limited.**

Stifel employees have limited access to client information based on their job function. This enables them to assist you in your transactions, offer additional financial services, and resolve problems that might arise.

All employees are instructed to use strict standards of care outlined in our Code of Conduct. Employees not adhering to these standards of conduct are subject to disciplinary action including dismissal.

**6. Your information is shared only in limited ways and for specific purposes.**

We may share your information with Stifel affiliates or with nonaffiliated companies outside Stifel to facilitate your transactions. Examples of nonaffiliated companies may include financial service companies, such as mutual fund or insurance companies. Other nonaffiliated companies may include companies we have contracted with to provide services on our behalf, such as statement and report printers, data processing vendors, computer software maintenance, transaction clearing firms, or third parties to distribute annual reports and proxy statements. We may share your information to implement security measures and fight fraud for your continued protection. We may also supply the most current and accurate information to credit bureaus or similar organizations.

**7. Other than disclosing information to third parties that perform certain transactions on your behalf, we do not reveal your information to nonaffiliated third parties unless we have previously informed you in disclosures or agreements, have been authorized by you, or are required by law.**

**8. If we share information with Stifel affiliates or other companies, they must agree to maintain the confidentiality and security of your information and to use it for the specific purpose identified by us.**

**9. Stifel does not rent or sell any client information collected through its web site or other means to any third-party marketers.**

**10. Stifel will continue to provide you notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. This policy may change from time to time. You may review our current policy on our web site at [www.stifel.com](http://www.stifel.com). When you access our web site, your information is protected through various forms of Internet security, such as passwords, data encryption, and Secure Socket Layers (SSL) technology.**

*\* Affiliates include Stifel, Nicolaus & Company, Incorporated and Century Securities Associates, Inc. Century Securities is an introducing firm and uses Stifel Nicolaus as its clearing firm.*

# ***Stifel, Nicolaus***

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***& Company, Incorporated***

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