

# PRIVACY POLICY / SPC FINANCIAL®

## WHAT DOES SPC FINANCIAL, INC. DO WITH YOUR PERSONAL INFORMATION?

**Why?** Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**What?** The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Name
- Social Security Number
- Address
- Phone Number
- Date of Birth
- Insurance Policy Information
- Raymond James Account Information
- Account Information & Balances
- Email Address
- Financial Information
- Tax Returns
- Legal Documents

**How?** All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SPC Financial, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SPC Financial, Inc. share?	Can you limit this sharing?
<b>For our everyday business purposes-</b> such as to process your transactions and maintain your account(s).	<b>Yes</b>	<b>No</b>
<b>For our marketing purposes-</b> to offer our products and services to you.	<b>Yes</b>	<b>No</b>
<b>For joint marketing with other financial companies.</b>	<b>No</b>	<b>We don't share</b>
<b>For our affiliates' everyday business purposes-</b> information is shared with SPC Financial, Inc.	<b>Yes</b>	<b>No</b>
<b>For our affiliates to market to you.</b>	<b>No</b>	<b>We don't share</b>
<b>For nonaffiliates to market to you.</b>	<b>No</b>	<b>We don't share</b>

**To limit our sharing** Email or call 1-301-770-6800 to speak to your financial advisor.

**Please note:**  
If you are a *new* customer, we can begin sharing your information for our affiliates' everyday business purposes immediately. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

**Independence** Investment advisory services offered through SPC Financial, Inc. SPC Financial, Inc. is not a registered broker/dealer.

**Questions?** Call your financial advisor at 1-301-770-6800.



**SPC Financial**<sup>®</sup>  
Finance on a Human Level<sup>®</sup>



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<b>Who we are</b>	
<b>Who is providing this notice?</b>	SPC Financial, Inc.
<b>What we do?</b>	
<b>How does SPC Financial, Inc. protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files, office space and buildings.
<b>How does SPC Financial, Inc. collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>■ Open an account with Raymond James or deposit money</li> <li>■ Submit documents for financial planning purposes</li> <li>■ Purchase an insurance policy</li> </ul> <b>OR</b> We also collect and share your personal information with others such as Raymond James Financial Services, Inc., Insurance companies, or e-Money Advisor.
<b>How does SPC Financial, Inc. share my financial information?</b>	We share your financial information <ul style="list-style-type: none"> <li>■ With Sella &amp; Martinic, LLC to prepare your tax returns or provide tax advice when you authorize us to do so</li> <li>■ With Orion Advisor Technology, LLC (“Orion”), which provides SPC with a platform for reporting, portfolio management and trading in your investment accounts</li> <li>■ With GxWorks, LLC (d/b/a HiddenLevers), an affiliate of Orion, for statistical and analytical modeling tools to assist SPC in portfolio management</li> <li>■ With Salesforce, a cloud-based customer relationship manager for maintaining client information and contact management, workflow creation, task management and analytics</li> <li>■ With eMoney for collecting financial information and preparing financial plans for our clients</li> </ul>
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for a service that is provided to me jointly with someone else?</b>	Your choices will apply to everyone on your account unless you tell us otherwise.

<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies.
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies
<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. We do not jointly market.

<b>Other important information</b>	
<b>State or local regulations</b>	If, in addition to federal law, you are protected by specific state or local regulations concerning information sharing and marketing, SPC Financial, Inc. will fully comply with these regulations as well.
<b>Chicago Clearing Corporation</b>	SPC Financial, Inc. (SPC) has arranged with Chicago Clearing Corporation (CCC) to provide a class action litigation claims service for our clients. CCC monitors securities class action cases. SPC provides data to CCC semi-annually consisting of our clients' securities trades and account information executed at Raymond James Financial Services, Inc. (RJFS) to enable CCC to identify qualifying trades which CCC uses in filing proof of claims for our clients. Clients have the right to Opt-In or Opt-Out of the service. For clients living in the states of CA, VT, AK, ME, MA, ND and LA, the default is Opt-Out. To receive the service of CCC, clients must affirmatively sign and return an Opt-In form to SPC. For clients living in all other states, the default is Opt-In. Clients who do not want to have their trades and account information shared with CCC must affirmatively sign and return an Opt-Out form to SPC. The services of CCC are independent from, and are not those of, RJFS and its affiliates, or SPC.