

DISCLOSURE NOTICES TO KEEP FOR YOUR RECORDS**Privacy Policy**

At Thurston Springer, protecting your privacy is very important to us. We value your trust and want you to understand what information we collect, how we use it, and how we protect it. The Gramm-Leach-Bliley Act, passed in November 1999, requires that all companies distributing financial and insurance products to the public develop and publish a privacy policy. Thurston, Springer, Miller, Herd & Titak, Inc.'s Privacy Policy provides information relating to how and when we share customer information with unaffiliated third parties. A copy of our privacy policy is delivered to clients at the time of account opening – either hand-delivered or by mail, and annually thereafter – by mail, to the last known address.

• Personal Information We May Collect

During our relationship, Thurston Springer may obtain nonpublic personal information from you. The information we obtain assists the firm and our Financial Advisors in providing you with products and services, and also to satisfy regulatory requirements. This information may be obtained from various sources including:

- Account applications and other forms,
- Your transactions with us or others,
- From written, electronic and verbal correspondence and communication,
- From a consumer reporting agency.

• The Balance of Respecting Your Privacy & Sharing Information with Third Parties

As a matter of policy, Thurston Springer does not disclose personal or account information provided by clients to non-affiliated third parties, except as follows:

- When required or permitted by law, or as necessary for third parties to perform their agreements with respect to services performed on our behalf.

Thurston Springer reserves the right to:

- In limited circumstances, disclose or report personal information to non-affiliated third parties when the firm believes in good faith that disclosure is required under law, and to cooperate with regulators or law enforcement authorities as may be requested.
- Disclose information about client accounts to a non-affiliated third party at the client's request, or with the consent of the client.
- Disclose personal information that is necessary in providing administrative, custodial, or customer assistance, and in preparing, printing, and delivering statements and other client related documents. These companies include clearing firms, mutual fund, annuity, and other financial services companies that aid in fulfilling these services to our clients.
- Thurston Springer does not provide information about our clients or former clients to any non-affiliated third party for marketing purposes.

• Opt Out Provision

If your Financial Advisor leaves Thurston Springer to join another broker-dealer that is a member of the Protocol for Broker Recruiting (to which our firm is a signatory), we may permit your advisor to retain certain contact information that may be used by his/her new firm; limited to your name, address, email address, phone number, account title and account type. If you object to such information being retained by your Financial Advisor or shared with his/her new firm, you may opt out by contacting our Compliance Department at (800) 433-8049 or emailing Compliance@ThurstonSpringer.com.

- **Procedures to Safeguard Private Information**

Thurston Springer maintains procedures and technology designed to prevent unauthorized access to private personal information. We restrict access to personal information to employees and service providers who need to know that information to provide products or services to you. Employees who violate our Privacy Policy are subject to company and regulatory disciplinary action.

When accessing your account via a link from www.ThurstonSpringer.com using a browser, such as Google Chrome or Microsoft Edge, it is encrypted using Secure Socket Layer (SSL) 128-bit encrypted security. This technology is used to protect the confidentiality of your personal information.

- **Change in Privacy Policy**

Thurston Springer reserves the right to modify or supplement this Privacy Policy at any time. If a material change is made, we will provide current clients with a revised notice that describes our new policy and if such practices so require, we will give them a reasonable opportunity to opt out of the disclosure of information under the revised Privacy Policy.