

PAINTER, SMITH AND GORIAN, INC.

PRIVACY STATEMENT

Important Notice to Clients OUR PRIVACY STATEMENT

Privacy at a Glance

Painter, Smith and Gorian, Inc. is dedicated to providing the highest level of service and protecting your privacy. As technology continues to transform the way information is collected and distributed, we want to make sure you know that we have implemented a number industry-leading practices for safeguarding the privacy and security of financial information about you.

- We employ safeguards to protect customer information and prevent fraud.
- We do **not** sell customer information to other companies for marketing purposes.

How You Can Help Protect Your Privacy

- Do not share your account information, passwords or code words with others.
- Never provide confidential information to unknown callers.
- When conducting business over the Internet, always use a secure browser and exit online applications as soon as you finish using them.
- Protect your account records.
- If you are a victim of fraud or identity theft, please contact your Financial Advisor to put holds on your accounts. Also, see the "Identity Theft Assistance" section of our Privacy Statement.

How We Secure Your Assets and Protect Information About You

- We continually enhance our security tools and processes.
- We take steps to protect customer data and accounts by asking you for information that only you should know when you contact us. We follow these procedures on the phone and over the Internet.

How We Protect Your Privacy Online

Protecting your personal information online is an essential part of our service to you.

- Our systems use technologies such as firewalls (which protect systems from intrusion) and encryption (scrambling of information) to protect customer information.
- We validate your identity through confidential access codes before we allow online access to your accounts.

How We Gather Information to Understand Your Financial Needs

The information we gather about you helps us to better understand your financial needs and to provide more personalized, efficient service to you.

The information we gather comes from a variety of sources, including:

- Information you provide to us (such as information on applications about assets and income).
- Information related to your transactions with First Clearing, LLC (Our Clearing Firm) and Painter, Smith and Gorian, Inc. (such as account balance and payment history).
- Information we obtain from others at your request (such as information about assets held at another institution for inclusion in a financial plan).

We carefully manage the information gathered about you as described in the following section.

How We Manage Information to Serve Your Needs

Other than the limited exceptions below, we do not provide customer information to companies affiliated with First Clearing, LLC or companies outside of First Clearing, LLC or Painter, Smith and Gorian, Inc. You do not need to request this confidentiality; it is our standard practice. In order to serve your needs, we may provide all of the information we gather:

- To comply with a legally permitted inquiry by a government agency or regulator;
- To specialists that perform business operations for us (such as statement and letter mailings);
- To companies whose shares you own so they may maintain accurate shareholder records;
- To others only as permitted or required by law (such as in response to a subpoena).

We select very carefully the outside companies that provide services on our behalf, and restrict the information we provide them to that which is necessary to fulfill their responsibilities or offer a service to you. These companies are prevented by legal agreement from using customer information for their own purposes or selling this information to others.

Other Applicable Laws

The practices just described are in accordance with federal law. We may also be subject to other privacy requirements under applicable state law.

Identify Theft Assistance

If you believe you may be a victim of identity theft:

- Contact your Financial Advisor to place holds on your accounts.
- Contact the Social Security Administration's Fraud Hotline at 1-800-269-0271 to report fraudulent use of your identification information.
- Report the incident as quickly as possible to each of the credit reporting agencies:
 - Experian 1-888-397-3742
 - Equifax 1-800-685-1111
 - TransUnion 1-800-916-8800
- File a police report in your local jurisdiction and retain the report number and the name of the officer who took the report.
- File a complaint with the Federal Trade Commission (FTC) by contacting the FTC's Identity Theft Hotline: 877-IDTHEFT.

We Strive to Maintain Accurate Information

We strive to maintain complete and accurate information about you and your accounts. If you ever believe that our records contain inaccurate or incomplete information about you, please let us know immediately. We are committed to resolving any inaccuracies as quickly as possible.

First Clearing, LLC is a registered broker dealer, a non-bank affiliate of Wells Fargo & Company, and member FINRA/SIPC.