

GRADIENT | SECURITIES, LLC

Gradient Securities, LLC's Privacy Statement

Gradient Securities, LLC is committed to safeguarding the confidential information of its clients. This information includes all personal data that we collect from you in connection with any of the services provided by Gradient Securities, LLC.

We collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you and providing customer service. We collect non-public information about you from the following sources:

- Information we receive from you on applications and other forms (including, but not limited to, your name, date of birth, address, telephone number, e-mail address, social security number, employment information, assets, income, investment experience and health information);
- Information about your transactions with us, our affiliates, and others;
- Information we receive from consumer reporting agencies and other entities not affiliated with Gradient Securities.

We limit access to non-public personal information to those employees, representatives and agents who need to know in order to conduct our business, service your account, keep you informed, and help you accomplish your financial objectives, such as providing you with a broad range of services and products. Our employees, representatives and agents are required to maintain and protect the confidentiality of your personal information and must follow established privacy procedures that comply with federal law. We maintain physical, electronic, and procedural safeguards to protect your personal information.

In the regular course of our business, we may disclose some or all of the non-public personal information described above with our affiliates and with non-affiliated third parties as necessary to effect, administer or enforce transactions that you request or authorize, or in connection with processing or servicing a financial product or service that you request or authorize.

Gradient Securities is a fully disclosed introducing broker-dealer, and a member of the Financial Industry Regulatory Authority ('FINRA') and an SEC registered investment advisor offering advisory services under the d.b.a. Gradient Wealth Management. Our affiliates are companies controlled by us, or companies controlling or under common control with us, including registered investment advisors and insurance agencies, their representatives, and agents. Our affiliates currently are Gradient Financial Group, LLC, Gradient Investments, LLC, Gradient Financial Direct, LLC, Registered Investment Advisor firms, Gradient Insurance Brokerage, Inc., Gradient Assurance Solutions, LLC, KonnexMe, LLC, Nextek, LLC, Case Central, LLC, and Gradient Advisors, LLC. Due to the complementary services offered by these affiliates based on the types of investment of the client, non-public client information may be necessarily shared between these affiliates to effect, administer, or enforce a transaction, or to process or service a financial product or service that you request or authorize.

The non-affiliated third parties with which we may share non-public client information include financial service providers such as clearing firms, mutual fund companies, investment money managers, insurance companies, and non-traded REIT companies with whom we have contracted, and in many cases, with whom the client has contracted. Their involvement is essential to the provision of overall service provided by Gradient Services to its clients. The information shared with these non-affiliated companies is not sold or

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rented to them, nor is it shared with them for marketing or solicitation purposes. We will share non-public information with non-affiliated companies only when they agree to uphold and maintain our privacy standards when handling a customer's personal information.

In addition, we may disclose non-public information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies, or with attorneys, accountants, or auditors as necessary to protect our rights and property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us, or we obtain your permission to do so.

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities and insurance laws. After this required period of record retention, all such information will be archived or destroyed. In all other respects, the information about former clients is treated in the same manner as information about current clients.

We strive to keep our customer records complete and accurate. We will give you reasonable access to the information we have about you. Most of this information is contained in account applications that you submit to us to obtain products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have any questions or concern about your personal information or this privacy notice, please contact our Compliance Department at [1-866-991-1539](tel:1-866-991-1539), or by mail at 4105 Lexington Avenue, Ste 380, Arden Hills, MN 55126, or by e-mail at compliance@gradientsecurities.com.

"Opting-Out" of Third Party Disclosure: If you do not want us to share your information (other than as prescribed by law) with any nonaffiliated third parties, including the registered representative servicing your account when he or she leaves us to join another firm, you may contact our Compliance Department by calling our toll-free number: [1-866-991-1539](tel:1-866-991-1539) or by mail at 4105 Lexington Avenue, Ste 380, Arden Hills, MN 55126, or by e-mail at compliance@gradientsecurities.com.

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Neither Gradient Securities, LLC nor any of its registered representatives or investment advisor representatives are permitted to give legal or tax advice on behalf of Gradient Securities, LLC, its subsidiaries, or affiliates.