



PRIVACY DISCLOSURE DOCUMENT

Protecting your privacy is very important to CS Ellis. We want you to understand what information we collect and how it is used. We collect and use “nonpublic personal information” to provide our clients with a broad range of financial products and services as effectively and conveniently as possible. We treat nonpublic personal information in accordance with our Privacy Policy.

Information We Collect and from Whom We Collect It

We may collect personal information about you from the following sources:

- Information we receive from you on applications or other forms
- Information about your transactions with us, our affiliates, or others

Information we receive from you voluntarily, such as your email address and any information contained in your email messages. “Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing a financial product or service to you. This information may be collected in person, by mail, fax, or by other electronic means as permitted by law or in accordance with express authorization from you. FINRA rules declare that all client information including statements, confirms, new account documents and correspondence are the property of CS Ellis. It is CS Ellis’ position that this information also belongs to the registered representative or advisor who introduces the client to CS Ellis, therefore, should a registered representative or advisor leave CS Ellis, he/she will be permitted to take with them their copies of client information. If you do not agree to this provision as a client, you are required to notify CS Ellis in writing. Your private information will be permitted to go with the registered representative or advisor upon their departure from CS Ellis unless your written notice is on file.

What Information We Disclose and to Whom We Disclose It

We do not disclose any nonpublic personal information about you to anyone without your express consent, except as permitted or required by law. We may disclose the nonpublic personal information we collect, as described above, to persons or companies that perform services on our behalf.

Your Right to Verify Accuracy of Information We Collect

Keeping your information accurate and up to date is very important to us. You may access and correct non-public personal information about you that we collect except for information relating to or in anticipation of a claim or a criminal or civil proceeding.

Other Security Procedures

We restrict access to the nonpublic personal information about you and allow disclosure only to those employees or persons and companies as permitted by law to assist in providing products or services to you. We maintain physical, electronic, and procedural safeguards to protect the nonpublic personal information about you. Should your relationship with us end, we will maintain and only disclose nonpublic personal information that we have about you in accordance with the Privacy Policy.

CUSTOMER IDENTIFICATION PROGRAM NOTICE

Important Information you need to know about opening an account. To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account. This Notice answers some questions about CS Ellis Customer Identification Program.

What types of information will I need to provide?

When you open an account, CS Ellis is required to collect information such as the following from you:

- Your name
- Date of birth
- Address
- Identification number
- U.S. Citizen: taxpayer identification number (Social Security Number or Employer Identification Number)
- Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You will also need to show your driver’s license or other identifying documents. A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement. U.S. Department of the Treasury, Securities and Exchange Commission, and FINRA rules already require you to provide most of this information. These rules may also require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

What happens if I don’t provide the information requested or my identity can’t be verified?

CS Ellis may not be able to open an account or carry out transactions for you. If you already have opened an account, they may have to terminate it.

We thank you for your patience and hope that you will support the financial industry’s efforts to deny terrorists and money launderers access to America’s financial system.

PROXY VOTING

CS Ellis does not vote proxies on behalf of its clients.