

## **BREWER INVESTMENT GROUP, LLC**

### **WEBSITE PRIVACY POLICY**

Brewer Investment Group, LLC (“Brewer” or “we” or “our” or “us”) has established this policy and the following guidelines in accordance with the privacy provisions of the Commodity Exchange Act. Our customer privacy policy applies to both current and former customers (“you” or “your”), and is designed to comply with all applicable sections of the Commodity Exchange Act.

#### **BREWER WEBSITE INFORMATION**

We do not gather information about you when you access our websites UNLESS you provide your name and other information in order to obtain information from us about our products or services or to register for a special offer shown on our websites. We collect neither client information and nor personal information about you when you simply visit our websites.

#### **COOKIES**

Cookies are small text files that a website transfers to your computer when you access a website. Cookies help you move through a website and are used to track your website usage. Brewer does not place cookies on the computers of persons using our websites.

Third-parties that have links on our website might place cookies on your computer. Brewer does not control third-parties’ use of cookies. Brewer has no control over what information about you is captured when you access a third-party website from a Brewer website. We do not have access to third-party cookies and we collect no information about you from third-party cookies. Please contact the third-parties’ sites for their policies regarding cookies. Brewer is not responsible for the actions or policies of such third-parties.

#### **HYPERLINKS**

Our websites may contain hyperlinks or links to other websites and other websites might link to our websites. Other websites may have privacy policies different from ours. This Privacy Policy applies only to Brewer websites. Brewer is not responsible for the policies of other websites that you link to and we do not have access to or control over any information collected by other websites. If you are asked to register on other websites, any information you provide goes directly to the other website. You should check the privacy policies of any linked websites.

## **CONFIDENTIALITY AND SECURITY PROCEDURES**

Brewer restricts access to Client Information about you to those of our employees who need to know that information in order to properly service your account with us.

Brewer also restricts access to Client Information about you to those unaffiliated third-parties whose access to your information is permitted by law and who need to know that information because they assist us in providing you with products and services.

Brewer protects the security of your Client Information by maintaining physical and electronic safeguards and by following procedures designed to protect your information.

When you enter information on our websites, that information is encrypted to prevent it from being intercepted while it is being transmitted to us. We use other safeguards such as firewalls and passwords to control unauthorized access to information.

## **INFORMATION WE COLLECT**

Brewer has access to your Client Information from the following sources:

- Information we receive from you on applications or other forms; and
- Information about your transactions with us, our affiliates or others, including your trading practices, your history of meeting margin calls and your use of Brewer's products and services; and
- Information we receive from a consumer reporting agency.

## **INFORMATION WE DISCLOSE**

We do not share our Client Information with any unaffiliated third-party except as permitted, or required, by law.

We share your Client Information with service providers such as Investment commission merchants (clearing brokers) and service bureaus that process your trades, provide your statements and calculate your margins on our behalf.

If at any time in the future Brewer decides to share your Client Information with any other unaffiliated third-parties, you will be given notice and will have the opportunity to opt-out of our sharing arrangement.

## **CATEGORIES OF PARTIES TO WHOM WE MAY DISCLOSE**

We may share your Client Information with our affiliates that are financial service providers, such as our securities broker-dealer or our foreign exchange broker.

We share your Client Information with other financial service providers, such as Investment commission merchants (clearing brokers) and clearing organizations in order to complete and process transactions that you initiated or requested and authorized.

We may also share your Client Information as permitted or required by law, such as in response to a subpoena or any legal process.

## **RIGHT TO OPT-OUT OF INFORMATION SHARING**

You may not opt-out of Client Information shared by us with financial service providers necessary to process or complete any transaction in your account with us, or from disclosures we make that are required by law.

If at any time in the future Brewer decides to share your Client Information with any other unaffiliated third-parties, you will be given notice and will have the opportunity to opt-out of our sharing arrangement.

## **WEBSITE PRIVACY UPDATES**

We may, from time to time, make changes to this Website Privacy Policy. We encourage you to review this Policy periodically to check for updates and changes to the Policy.

If you are a Brewer customer with a user ID and password, we will notify you of changes to the Privacy Policy when you log on and you will be required to read the revised statement. You will not be able to access your account information until you agree to the terms of the modified Privacy Policy.

## **ON-LINE SERVICES**

If you register for our online products or services, we retain your user ID and password and other information about your use of the website in order that we may recognize you as a registered user. We may obtain your email address from you or from another source. We may send you email offers for our products and services or for our affiliates' products and services. All email offers we send include an opportunity to opt-out from receiving future email offers for third-party provided products and services.

If you opt-out from receiving email offers, we may still send emails or other communications on important information about your account or about our products and services or our affiliates' products and services.

**QUESTIONS**

If you have any questions about this Privacy Policy, please contact Brewer Investment Group's Compliance Department, at 312-896-3930 or 1-800-971-2440.