

## **PRIVACY STATEMENT OF VNTR Securities LLC**

The confidentiality of client information is an important concern of VNTR Securities LLC (“The Firm”). The Firm takes precautions to safeguard personal client information at all times and we will remain vigilant in protecting that information. The provisions of this privacy notice will apply to former clients as well as current clients.

The Firm collects personal information about you that is necessary to provide financial products or services. We may obtain this information from the following sources:

- Information that the Firm receives from you on account applications, forms and other materials that you provide to us, whether in writing, in person, by telephone or by any other means. This information may include your name, address, telephone number, social security number, occupation, assets and income.
- Information about your transactions with us or a non-affiliated third party such as account balances, payment history and account activity.
- Information we receive from a consumer-reporting agency, such as your credit bureau reports and other information relating to your creditworthiness.

The Firm will only disclose certain information about you, as permitted by law, under the following circumstances: Where we believe, in good faith that disclosure is required under law to cooperate with regulators or law enforcement authorities or to consumer reporting agencies. The Firm may disclose certain information with its affiliates to provide you with other services. Our affiliates, in turn are required to protect the confidentiality and security of any information we give to them and may not reuse it for any other purpose. The Firm may disclose certain information to our service providers to help us process your application or service your accounts. These service providers, in turn are required to protect the confidentiality and security of any information we give to them and may not reuse it for any other purpose.

The Firm restricts access of your personal accounts(s) and information to those employees who require access to that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with the industry standards to safeguard your nonpublic personal information. Third parties who have access to such personal information must agree to follow appropriate standards of security and confidentiality.

Should you have any additional questions or wish to opt out of any of these provisions, please contact our compliance department at:

VNTR Securities LLC  
Compliance Department  
152 Madison Avenue, 7<sup>th</sup> Floor  
New York, NY 10016

## **NOTICE TO CLIENTS**

### **Important Information You Need to Know About Opening a New 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 your firm's Customer Identification Program.

### **What types of information will I need to provide?**

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

- Your name
- Date of birth
- Address
- Identification number:
  - US 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 yourself.
- You may 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, FINRA, and the New York Stock Exchange rules already require you to provide most of this information. These rules also may 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?**

Your firm may not be able to open an account or carry out transactions for you. If your firm has already opened an account for you, they may have to close 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.