

▲ McAdams ▲ Wright ▲ Ragen ▲

I N C O R P O R A T E D

McAdams Wright Ragen Commitment to Privacy

McAdams Wright Ragen, Inc. (“MWR”) and National Financial Services LLC (“NFS”) have an agreement that NFS will provide trade execution, clearing, custody, and related activities for your MWR investment account. In connection with these services, NFS is required to communicate its position as it pertains to the privacy of customer information. NFS has separately sent you their privacy statement.

Please take a moment to review our privacy policy and to learn the steps we take to protect your information, as well as how we use that information to service your account.

MWR Privacy Policy

MWR will never sell your personally-identifiable financial information or make it available to unaffiliated third parties for marketing purposes. If you are a former customer, your information is treated in the same manner as the information of current customers. Nevertheless, under the terms of an industry Protocol with certain other brokerage firms, your MWR representative may use your contact information (for example, your name, address, e-mail address and phone number) in the event your representative joins one of these firms. We place a high value on the confidentiality of our relationship with our customers.

All financial services companies need to share clients’ personal information to run their everyday business. For example, we share information with NFS to complete transactions executed on your behalf and to establish and maintain accounts on your behalf. Information sharing with non-affiliates is governed by agreements that strictly limit access and use of client data to the purposes contracted for. You are not able to limit all information sharing because Federal law permits certain types of sharing and because limiting all information sharing would prevent us from providing even basic services to you.

How and why MWR obtains information.

In order to facilitate the servicing of your account, MWR may receive nonpublic personal information about you from any of the following sources:

- From your applications or forms (examples include name, address, Social Security number, birth date, assets and income)
- From transactional activity in your account (examples include trading history and balances)

- From verification services and consumer reporting agencies (to ensure the accuracy of application data, confirm identity, or to assess creditworthiness if you apply for NFS's credit products)
- From other sources with your consent (for example, from other institutions if you transfer positions into MWR)

How does MWR use your personal information?

We use your personal information to operate our business and to provide services to you in accordance with our professional obligations. For example, we use your information to evaluate investment opportunities and to formulate appropriate recommendations or investment advice based on your personal circumstances. Additionally, we may use your information to process, service, and maintain accounts and transactions; respond to inquiries and requests; verify income, asset and obligation information; resolve disputes; prevent fraud; make contact with identified persons in the event of an emergency; monitor and archive communications; and perform risk control. Additionally, we may use your personal information to verify your identity, including, where applicable, verification in accordance with the USA PATRIOT Act. We also use personal information to comply with legal and regulatory requirements, to oversee activity in your account, and in accordance with applicable laws, rules, and regulations.

How MWR protects your information.

MWR has always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We employ information protection controls in keeping with industry standards and practices, and we regularly adapt these physical, electronic and procedural controls to respond to changing requirements and advances in technology.

Within MWR and among our service providers, we restrict access to your information to those who require that access in order to provide products and services to you. We may share the personal information that we collect about our customers, prospects or former customers with:

- Affiliates under common ownership and control, generally for the purpose of providing a service you have requested or for securing compliance, legal, or other professional services to aid us in the execution of our business. We will not share your personal information with affiliates for marketing purposes.
- Unaffiliated service providers (for example, fulfillment companies and securities clearinghouses; vendors who provide software or services to assist us with operational or compliance-related duties; professionals we may engage for our business purposes, such as attorneys or consultants).
- Government agencies and law enforcement officials (for example, for tax reporting or under court order).
- Other organizations, as permitted by the laws that protect your privacy (such as for fraud prevention).

- Other organizations, with your consent (for example, if you request personalized performance reporting or ask that information be shared with your attorney or accountant).

When we share your information with outside service providers, our policies require us to confirm that the other entity will protect your information. Contracts and other agreements with these third parties contain affirmations of compliance with applicable privacy requirements.

Privacy Online.

MWR considers privacy, security, and service in our online operations to be just as critical as in the rest of our business. We therefore employ the safeguards described above, along with the following Internet-specific practices.

MWR uses a variety of proven protections to maintain the security of your online session. For example, we make use of firewall barriers, encryption techniques and authentication procedures. We also use cookies and similar files that may be placed on your hard drive for security purposes, to facilitate site navigation and to personalize the appearance of our site.

When you visit MWR's Internet sites, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited and average time spent on our Web sites. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

Your connection to MWR.

For your convenience, MWR offers several options for accessing your account information. You can review your information independently using your statements, or through our Internet services. You may also e-mail, write, or call us with your request for information. If we serve you through an investment professional, please contact them directly. Specific Internet addresses, mailing addresses, and telephone numbers are listed on your statements and other correspondence.

How can you verify that your personal information is accurate?

Our intention is to keep personal information only for so long as is necessary for business purposes; to meet legal and regulatory requirements; and to keep our records current and complete. Your basic account information is provided to you at the time you open your account, and periodically thereafter. If your information changes or if you are aware of an inaccuracy in our records, please contact your representative. Please do not send any personal information via nonsecure methods of communications, including via public electronic communications such as e-mail, which generally are not secure.