



Your privacy is not simply a company policy. It's our promise.

The following are our standards of privacy:

Protecting Your Privacy

At Sterne Agee, protecting our clients' privacy is paramount, and we realize that an individual's financial matters are extremely private and sensitive in nature. The following is our privacy policy and pledge to you. This policy and pledge enables us to protect your privacy while providing you with high quality products and services. This privacy policy applies to our entire Sterne Agee Group, Inc. corporate family, which includes: Sterne, Agee & Leach, Inc.; Sterne Agee Asset Management, Inc.; The Trust Company of Sterne Agee, Inc. ; Sterne Agee Clearing, Inc.; Sterne Agee Financial Services, Inc.; and Sterne Agee Investment Advisors, Inc. Although each subsidiary of the Sterne Agee Group, Inc. has a specific area of expertise, the entities work in tandem to fulfill our clients' overall financial needs.

Information We Collect

We collect only the information that is required to provide you with quality professional services or that is required by law and regulation. We maintain strict security procedures to protect the information that we collect. We collect nonpublic personal information about you from: applications or other forms we receive from you; transactions with us, our affiliates, or others; and consumer reporting agencies as needed.

Limited Disclosure of Information

We provide non-public personal information (as noted above) to outside vendors only to the extent necessary to complete your financial transactions, keep you fully informed as to these transactions, and maintain our professional relationship with you. Any information that we must provide to outside vendors is restricted as to content and recipient. Any organization that receives such information must provide us with a copy of its privacy policy, and each policy will be reviewed to ensure that it is sufficient to meet Sterne Agee's client information privacy standards. Under no circumstances, will Sterne Agee sell information about you or your business to any public or private vendor. We may also disclose personal information in the following instances: to comply with federal, state or local laws, rules and other applicable legal requirements; to comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by federal, state or local authorities; or to respond to judicial process or government or self-regulatory authorities having jurisdiction over you or us for examination, compliance, or other purposes as authorized by law.

Confidentiality and Security

Employee access to client information is restricted to those who have a legitimate need to know in order to provide our professional services or to comply with laws and regulations. We maintain both physical and electronic safeguards in accordance with federal law and regulatory standards; any employee who has access to individual information receives training about and is required to follow company procedures designed specifically to keep that information confidential. These procedures are also designed to ensure that your financial information is accurate, current, and complete. Please notify us if at any time our records contain incomplete or inaccurate information about you. Upon notification from you regarding our records, we will promptly address your concerns and make any necessary corrections.

Information Sharing Within Our Corporate Family

Our clients clearly benefit from information shared within Sterne Agee Group, Inc. It is important that we have the ability to share this information to provide the quality products and services associated with your entrusting your securities business to us. Protecting your privacy is an on-going process. As technology continues to advance, Sterne Agee will continue to evaluate its security standards and procedures associated with protecting your privacy. Nothing is more important to us than our clients' trust and confidence, and we will take whatever steps necessary to maintain the security of our professional relationships. Our policies and practices for the disclosure of information, stated above, apply to both current and former clients of Sterne Agee Group, Inc. and affiliates. Sterne Agee Group, Inc.; Sterne Agee Asset Management, Inc.; The Trust Company of Sterne Agee, Inc.; and Sterne Agee Investment Advisors, Inc. are not registered broker-dealers. Sterne Agee Group's subsidiaries—Sterne, Agee & Leach, Inc.; Sterne Agee Clearing, Inc.; and Sterne Agee Financial Services, Inc.—are registered broker-dealers and are members of the Securities Investor Protection Corporation (SIPC).