

Privacy Statement of Scottsdale Capital Advisors

Last year Congress passed major changes to modernize the laws that govern the financial services industry, including those designed to safeguard individual privacy. At Scottsdale Capital Advisors protecting our clients' privacy is paramount; we recognize that an individual's financial matters are extremely private and sensitive in nature. These new laws and regulations, combined with our long-standing firm policies, enable us to protect your privacy and, at the same time, provide you with a broad range of high quality accounts and services.

Scottsdale Capital Advisors is committed to safeguarding the confidential information of its clients. This information includes all personal data that we collect from you in connection with any of the services provided by Scottsdale Capital Advisors.

We collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. We collect non-public information about you from the following sources:

- Information we receive from you on applications and other forms (including but not limited to your name, date of birth, address, telephone number, e-mail address, social security number, employment information, assets, income, investment experience, and health information);
- Information about your transactions with us, our affiliates and others; and
- Information we receive from consumer reporting agencies and other entities not affiliated with Scottsdale Capital Advisors

We limit access to non-public personal information to those employees, representatives and agents who need to know in order to conduct our business, service your account, keep you informed, and help you accomplish your financial objectives, such as providing you with a broad range of services and products. Our employees, representatives and agents are required to maintain and protect the confidentiality of your personal information and must follow established privacy procedures. We maintain physical, electronic, and procedural safeguards to protect your personal information.

In the regular course of our business, we may disclose some or all of the non-public personal information described above with our affiliates and with non-affiliated third parties as necessary to effect, administer, or enforce transactions that you request or authorize, or in connection with processing or servicing a financial product or service that you request or authorize.

Scottsdale Capital Advisors is a fully disclosed introducing securities broker-dealer and registered investment advisor, and a member of the National Association of Securities Dealers ("NASD") and the Securities Investors Protection Corporation ("SIPC").

The non-affiliated third parties with which we may share non-public client information include financial service providers, such as clearing firms, mutual fund companies, investment money managers, and insurance companies with whom we have contracted, and in many cases, with whom the client has contracted as well. Their involvement is essential to the provision of overall service provided by Scottsdale Capital Advisors to its clients. The information shared with these non-affiliated companies is not sold or rented to them, nor is it shared with them for marketing or solicitation purposes. We will share non-public information with non-affiliated companies only when they agree to uphold and maintain our privacy standards when handling a customer's personal information.

In addition, we may disclose non-public information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies, or with attorneys, accountants, or auditors, as necessary to protect our rights and property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities and insurance laws. After this required period of record retention, all such information will be archived or destroyed. In all other respects, the information about former clients is treated in the same manner as information about current clients.

We strive to keep our customer records complete and accurate. We will give you reasonable access to information we have about you. Most of this information is contained in account statements that you receive from us and applications that you submit to obtain our products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have any question or concern about your personal information or this privacy notice, please contact our Compliance Department phone: 480-603-4900 address: 7170 E. McDonald Drive, Suite 6, Scottsdale, AZ 85253