



THE GARLIKOV COMPANIES

Your privacy is our priority.

The collection and use of personal client information is fundamental for us to provide and administer financial solutions including products and services, to you, our clients. We collect and use this information for purposes such as requesting insurance underwriting, administering and servicing insurance programs, evaluating benefit claims, processing transactions you request and offering additional financial products or services.

We value our relationship and the trust you have in us; therefore, we do everything we can to guard your personal financial information. The following details our approach to protecting your privacy.

THE GARLIKOV COMPANIES privacy policy applies to all current and former clients. Information that personally identifies you or your accounts is considered “personal information.”

1. We do not sell your personal information to anyone.
2. We do not disclose personal information to third parties unless one of the following limited exceptions applies.

We disclose personal information such as account and transaction data to companies, including financial institutions, which contract with THE GARLIKOV COMPANIES to issue policies, execute transactions, act in a custodial capacity, etc. In such instances, we have contracts with these companies which prohibit them from using your personal information for their own purposes.

We may disclose personal information to companies that help us process or service your transactions or account(s).

We may disclose or report personal information under limited circumstances if we believe, in good faith, that disclosure is required by law. For example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, or for institutional risk control.

Outside of these exceptions, we do not share your personal information with third parties without written instruction from you via letter, fax, email, or by email communication on record for your account. For security purposes we recommend personal information be provided through secure, encrypted email.

3. We do collect personal information in the normal course of business to administer your accounts and serve you better.

Information from Individuals Most information we collect is obtained directly from you or from your representative(s) when applying for products or services. For life insurance we may collect information pertaining to a person’s health, occupation, purchase of securities products or services, including information about existing insurance. The information we collect may include name, address, phone number, email address, Social Security number,

date of birth, marital status, financial data and information about your investment desires and experience.

Information from Third Parties When verification or additional information is required we may request information from third parties including consumer reporting agencies, employers, benefit plan sponsors, third party administrators, insurance companies, or other organizations holding information necessary to allow us to serve you.

Personal information collected from individuals and third parties may vary depending on the type of policy or service applied for by the individual. We only collect medical information in connection with underwriting life insurance policies or as may be necessary for claim settlement purposes.

4. We may share personal information with affiliated and nonaffiliated companies and regulatory agencies.

GARLIKOV & ASSOCIATES, INC., GARLIKOV ADVISORS, INC., a Registered Investment Advisor and The Leaders Group, Inc., a Registered Broker/Dealer, member FINRA/SIPC are required by their various regulatory authorities such as the U.S. Securities Exchange Commission (“SEC”), Financial Industry Regulatory Authority (“FINRA”) and state jurisdictions, to collect, review and maintain certain personal information such as investment history, financial data, and employment history through THE GARLIKOV COMPANIES. Because THE GARLIKOV COMPANIES use one email address for the separate business purposes of our organizations and nonaffiliated organizations with which we and our staff are associated, THE GARLIKOV COMPANIES may share your personal information with staff of a nonaffiliated party to facilitate the servicing of your account or insurance policy.

5. We protect the confidentiality and security of your personal information.

Companies that provide support services are not permitted to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information for the performance of the specific service we request. We restrict access to personal information only to select employees and agents who have a need for such information strictly for business purposes. All such individuals are trained and required to safeguard such information.

We maintain physical, electronic, and procedural safeguards to guard your personal information.

6. We continue to evaluate and update our privacy and security policies to remain current with changing regulatory requirements.

Any personal information you receive that is not accurate requires you to **contact us immediately** so that we may promptly update our records.

If you have any questions or concerns regarding the information provided in this communication, please contact our Chief Compliance Officer at (614) 221-0900.