

Privacy Policy

Holistic Brokerage, LLC serves your brokerage account as an introducing broker-dealer by arrangement with our clearing broker-dealer, Pershing LLC. At Holistic Brokerage, LLC, we know that privacy is an important issue for clients. It is our policy to respect the privacy of all accounts that we serve as introducing broker and to protect the security and confidentiality of non-public personal information relating to those accounts.

CONSUMER PRIVACY NOTICE: Holistic Brokerage, LLC, is a FINRA and SEC registered Broker-Dealer, referred collectively as ("Holistic Brokerage, LLC" "us" "we" or "our"). Holistic Brokerage, LLC believes in protecting the confidentiality and security of information we collect about individuals. This notice describes the privacy policy followed by Holistic Brokerage, LLC regarding how we treat the information we receive, including via our Website ("Information") about individuals who apply for or obtain our products or services ("Individuals") and the third parties with whom we may share this information.

INFORMATION WE COLLECT: In order to service your account as a brokerage firm, Holistic Brokerage, LLC obtains public and non-public information from you, and third parties that service your account. This information is collected in order to provide the financial services you have requested. "Nonpublic Personal Information" is nonpublic information about the Individual that we obtain in connection with providing a financial product or service to the Individual for personal, family, or household purposes. We collect Nonpublic Personal Information about Individuals from the following sources: Information provided to us directly by an Individual on an application or other form in connection with our products or services. This may include but is not limited to: name, address, telephone number, social security number, occupation, assets, and income. Information about an individual's transactions with us, our affiliates, or others, such as account balance, payment history, parties to a transaction, credit/debit card usage, credit report and insurance policy coverage and premiums. Information which may be received from consumer reporting agencies, such as credit bureau reports, and other information relating to your creditworthiness. Information which may be received from other sources with your consent or with the consent of the investment consultant/advisor or clearing broker servicing your account.

SHARING OF NON-PUBLIC PERSONAL INFORMATION: We do not disclose nonpublic personal information of current or former customers to any third parties, except as required or permitted by law and in order to facilitate the maintenance of accounts, processing, and clearing transactions in the ordinary course of business. In order to affect your transactions and service your account properly, we may disclose all of the information that we collect, as described above, to firms that assist us in servicing your account, such as the clearing broker-dealer Pershing LLC. All records containing your nonpublic information are kept at our principal place of business and may also be kept by our service provider(s), such as Pershing LLC. In connection with servicing your account, your nonpublic personal information may be shared among entities named in this notice, their affiliates, and no-affiliates whom provide



services regarding or relating to your account, including transfer agents or other service companies. Our affiliates and any non-affiliated service providers are required to protect the confidentiality of your information and to use the information only for the purposes for which disclosure to them is made. Service providers restrict access to nonpublic personal information about you to those employees who need to know that information to provide products and services to you. We, our affiliates, and the service providers we use maintain physical, electronic, and procedural safeguards to maintain the security of your nonpublic personal information. We do not sell nonpublic personal information. We do not disclose nonpublic personal information about customers to non-affiliated third parties, except as described in this Privacy Notice or except as permitted or required by law.

DISCLOSURE OF INFORMATION ABOUT FORMER CUSTOMERS: If an Individual decides to close an account or otherwise becomes an inactive customer we will continue to follow the privacy practices described in this notice with respect to such individual.

PROTECTING CONFIDENTIALITY AND SECURITY: Holistic Brokerage, LLC treats information in a confidential manner. Our employees are required to protect the confidentiality of Information. Employees may access Information only when there is an appropriate reason to do so, such as to administer or offer our products and services. Employees are subject to disciplinary rules if they do not comply with our policies. We have educated our staff with regard to this privacy policy and as a general policy, our staff will not discuss or disclose information regarding an account except with authorized personnel or as required by law or pursuant to regulatory request and/or authority. Holistic Brokerage, LLC strives to ensure that our systems are secure and that they meet industry standards. We maintain physical, electronic, and procedural safeguards to protect Information; these safeguards meet or exceed applicable law. Our commitment to data security involves monitoring new advances in security technology and enhancing our security architecture to ensure that we provide a high level of privacy for investment services firms and their customers. Where appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Third parties who may have access to such personal information must also agree to follow appropriate standards of security and confidentiality.

ACCESS TO YOUR INFORMATION: You may access your account information through a variety of media offered by Holistic Brokerage, LLC and by our clearing firm Pershing LLC (i.e., statements or online services). Please contact Holistic Brokerage, LLC if you require any additional information.

PROTECTION OF YOUR INFORMATION: You can help safeguard your personal information by taking a few simple precautions:

- Do not disclose your account information, personal identification numbers, passwords or code words to others.
- Never provide confidential information to unknown callers.
- When utilizing the internet, be sure to use a secure browser and exit online applications as soon as you finish using them.
- Ensure your personal computer has virus protection software and never open email from unknown sources.



• We continually strive to maintain complete and accurate information about you and your accounts. If you ever believe that our records contain inaccurate or incomplete information about you, please let us know immediately. We will correct any inaccuracies as quickly as possible.

CHANGES TO THIS POLICY: Holistic Brokerage, LLC reserves the right to make changes to this policy.

HOW TO CONTACT HOLISTIC BROKERAGE, LLC ABOUT THIS PRIVACY POLICY If you have any questions about this PRIVACY POLICY, please contact us at (305) 374-1177, fax: (786)-360-1625, or by email: compliance@hb-us.com

Client Identification Program

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. This information will be verified against other Federal and International Agencies like OFAC, of the Treasury Department of the US.

What this means for you: When you open account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.