

Privacy Policy

WHAT DOES IFCF DO WITH YOUR PERSONAL INFORMATION? REV. 8/2016

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? The types of personal information we collect and share depend on the product or service you have with us. This information can include: Social Security number and income, Investment experience and account balances, Credit card/other debt and credit history

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons IFCF chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does IFCF share?	Can you limit this sharing?
For our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes, to offer our products and services to	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes, information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes, information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We Don't Share
Your representative changes firms	Yes	Yes

To limit our sharing call (888) 343-3621. Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions? Call (888) 343-3621 or go to www.intlfcstone.com/Main-Channels/Securities/Capabilities/Securities/Disclosures/.

Who is providing this notice? One or more of INTL FCStone Financial Inc., (IFCF) INTL Custody and Clearing Solutions Inc., SA Stone Wealth Management Inc., SA Stone Investment Advisors Inc. and INTL Advisory Consultants Inc.

How does IFCF protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does IFCF collect my personal information? We collect your personal information, for example, when you: Open an account with us or apply for a loan, make deposits in accounts or withdrawals from accounts, give us your income information or employment history. We collect your personal information from others, such as credit bureaus or certain other companies.

Why can't I limit all sharing? Federal law gives you the right to limit only: Sharing for affiliates' everyday business purposes – information about your creditworthiness, affiliates from using your information to market to you, sharing for non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. See "Other important information (continued)."

What happens when I limit sharing for an account I hold jointly with someone else? Your choices will apply to everyone on your account.

Definitions Companies related by common ownership or control. They can be financial and nonfinancial companies.

Affiliates Our affiliates include broker-dealers, investment advisors, future commission merchants and insurance sales agencies, such as INTL FCStone Financial Inc., INTL Custody and Clearing Solutions Inc., SA Stone Wealth Management Inc., SA Stone Investment Advisors Inc., INTL Advisory Consultants Inc., INTL CIBSA S.A., INTL FCStone Ltd., INTL FCStone DVTM LTDA, and Gainvest Societe Gerente de Fondos Cumunes de Inversion S.A.

Non-Affiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies: credit bureaus, closing agents, card processors, check printers, mutual fund companies, annuity companies, insurance companies, and internet banking service providers.

Joint marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Some of IFCF's affiliates have joint marketing agreements with credit card companies or others.

Do Not Call Policy: This notice is the Do Not Call Policy of IFCF and its affiliates under the Telephone Consumer Protection Act. We do not solicit via phone numbers listed on the state or federal Do Not Call lists, unless the law permits. Consumers who ask not to receive telephone solicitations from IFCF will be placed on the Do Not Call list and will not be called in any future solicitations, including those of IFCF affiliates. If you communicate with us by telephone, we may monitor or record the call.

For Nevada residents only. We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by following the directions in the "Can you limit this sharing" section by choosing to limit sharing "For our affiliates to market to you." Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; Phone number: (702) 486-3132; e-mail: BCPINFO@ag.state.nv.us. IFCF, 2 Perimeter Park S, Suite 100W, Birmingham, AL 35243; Phone Number (888) 343-3621; e-mail: Click on "Contact Us" at the bottom of www.intlfcstone.com.

Vermont: In accordance with Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, except as permitted by law, such as with your consent, to service your accounts or to other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with your authorization or consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

California: In accordance with California law, we will not share information we collect about you with companies other than our affiliates, unless the law allows. For example, we may share information to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing with and among our affiliates to the extent required by California law.

We collect personally identifiable information from online customers when those customers choose to enter their personal information while using our web site and/or online services (including mobile applications). This information includes, but is not limited to, customer names, e-mail and mailing addresses, phone numbers, and social security numbers. We do not collect personally identifiable information from general online site visitors unless those consumers unilaterally opt to provide personally identifiable information to us. We also do not share personally identifiable information with third-party persons or entities unless authorized by the customer.

Online customers wishing to change the contents of the personally identifiable information previously supplied to us may do so by contacting our local branch office and requesting the change. Alternatively, some web sites and online services we offer permit customers to change the contents of their personally identifiable information online.

As stated above, we do not collect personally identifiable information about individual consumers unless those consumers choose to provide such information. We are aware that some internet browsers have incorporated Do Not Track ("DNT") features. Most of these features, when turned on, send a signal or preference to the web sites you visit indicating that you do not wish to be tracked. Because we do not collect personally identifiable information unless the online customer voluntarily submits it, and because of a lack of industry standard, we do not currently respond to DNT signals, whether on its web sites or other online services.

We do not allow other parties to collect personally identifiable information about our online customers' individual online activities over time or across different web sites. We cannot, however, guarantee protection from web-based criminal conduct that could result in the collection of an online customer's personally identifiable information by an outside party.

For Insurance Customers in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR, and VA only. The term "Information" in this part means customer information obtained in an insurance transaction. We may give your Information to state insurance officials, law enforcement, group policy holders about claims experience, or auditors as the law allows or requires. We may give your Information to insurance support companies that may keep it or give it to others. We may share medical Information so we can learn if you qualify for coverage, process claims, or prevent fraud or if you say we can. To see your Information, contact the employee who services your account by mail or telephone. You must state your full name, address, the insurance company, policy number (if relevant), and the Information you want. We will tell you what Information we have. You may see and copy the Information (unless privileged) at our office or ask that we mail you a copy for a fee. If you think any Information is wrong, you must write us. We will let you know what actions we take. If you do not agree with our actions, you may send us a statement.

For MA Insurance Customers only. You may ask in writing the specific reasons for an adverse underwriting decision. An adverse underwriting decision is where we decline your application for insurance, offer to insure you at a higher than standard rate, or terminate your coverage. We may change this privacy policy at any time, and any changes or updates will be