Privacy Policy

Privacy Notice
Part of what you expect from D.A. Davidson Companies, including D.A. Davidson & Co., D.A. Davidson Trust Company, Davidson Investment Advisors and Davidson Fixed Income Management, is information: about investment strategies, particular investments or the markets. The information you provide to us is equally important. Our understanding of each customer is the foundation for all the services we provide and offer. The information you provide helps us to better serve your investment and planning needs. We take seriously our responsibility to keep your personal information confidential and secure.

How We Collect Information
Most of the information we collect about you comes directly from you: from applications, agreements or forms that you complete in order to receive our products and services. In addition, we maintain required records of each of your transactions and holdings with any of the D.A. Davidson Companies.

Why We Share Information
We respect your privacy and do not sell information about our customers to anyone or disclose nonpublic, personal information except as authorized by the customer, as required or permitted by law or regulation, or as described in this policy. Examples of persons and entities to whom we disclose your information include:

<table>
<thead>
<tr>
<th>Why We Share Information</th>
<th>Does D.A. Davidson Share?</th>
<th>Can You Limit Sharing?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other companies as necessary to process your business, such as giving your information to the company that prints your account statements. The company must limit their use of the information to that purpose.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Companies that perform marketing services on our behalf or with whom we have joint marketing agreements. For instance, a company that assists in a broad mailing of materials advertising our products or services or the company that offers Visa® card access to your account.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Those authorized specifically by you. You may direct us to give your information to third parties, such as sending your account statements and confirms to a CPA.</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>To comply with a regulatory or legal request. We may be obligated to comply with a request from our regulators or respond to a court order or subpoena, or to a successor of all or part of our business.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>To facilitate joint services with an affiliate. If your account was established through a referral by an employee in one of our affiliated companies, such as a trust account established at our trust company by referral through a Financial Professional in our broker-dealer company, then unless otherwise instructed by you, certain ongoing account information will be shared with the employee who made the referral.</td>
<td>YES</td>
<td>YES</td>
</tr>
</tbody>
</table>

Cookies and Web Beacons
D.A. Davidson’s websites use cookies and web beacons to assist users when using our website and gather anonymous information. Users can remove or remove or reject cookies via their browser settings, located within their device’s “settings”, “help”, “tools” or “edit” menus. If a user rejects cookie, they still may use our Site but will have limited functionality.

Confidentiality, Security, and Integrity
We consider all personal information we have about you to be confidential, including the fact that you are a customer of a D.A. Davidson company. We restrict access to personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with applicable regulatory standards to maintain the confidentiality of your personal information.

Verification of Certain Account Information
Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account. Accordingly, when you open an account with us, we will ask for your name, address, date of birth, and other personal information that will allow us to identify you. We may also ask to see documentation that supports your identity.

Health and Medical Information
Those members of D.A. Davidson Companies’ corporate family as identified below may collect certain health and medical information about you in connection with an insurance transaction initiated by you. This information is disclosed only as necessary in order to process your insurance application. For instance, your health and medical information may be disclosed to an insurance body or third party to enable it to perform its insurance function in connection with an insurance transaction involving you. You may either personally see, or obtain from us by mail, the medical, or health information about you that we possess in our files. If you believe this information is incomplete or inaccurate, you may request that we make any necessary additions or corrections or, to the extent that it is feasible, that we delete this information from our files.
Security and Retention of Personal Information
We take reasonable steps, consistent with generally accepted industry standards, including technical, administrative and physical safeguards to protect the personal information submitted to us from loss, misuse and unauthorized access, disclosure, alteration and destruction. However, no method of security or transmission over the Internet is entirely secure. You should always use caution when transmitting personal information over the Internet. D.A. Davidson is obligated, per its regulatory record retention requirements, to maintain client data for six years after the account has been closed.

Marketing
We may contact you periodically by email to provide information regarding products, services and content that may be of interest to you, unless you inform us that you do not wish to receive marketing or market research communications from us. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.

If you wish to stop receiving marketing or market research communications from us, or would like to stop processing your personal information in any other way, you can contact us as described below to let us know what types of communications you wish to stop receiving.

Protocol Information
D.A. Davidson & Co. has entered into a protocol with certain other brokerage firms pursuant to which your Financial Professional may take your personal information, limited to your name, address, telephone number, email address, and account title, in the event your Financial Professional leaves D.A. Davidson and joins one of the other protocol member brokerage firms.

Contact details
If you have any questions about this Privacy Notice or other privacy concerns, please contact your Financial Professional.

For Vermont and California Residents Only
The information-sharing practices described above are in accordance with federal law. Vermont and California law place additional limits on sharing information about Vermont and California residents so long as they remain residents of those states. For Vermont residents, we will not share any of your information with our affiliates except with the authorization or consent of the Vermont resident. For California residents, we will limit sharing of your information among our affiliates to the extent required by applicable California law. Further information for California residents may be found in our Privacy Notice for California Residents (below).

For Nevada Residents Only
Nevada law requires that we provide you with the following contact information:

- Bureau of Consumer Protection
- Office of the Nevada Attorney General
- 555 East Washington Avenue, Suite 3900
- Las Vegas, NV 89101
- Phone number: (702) 486-3132 or by email through this link: www.ag.nv.gov

You may have more questions about how we respect your financial privacy. Please feel free to contact your D.A. Davidson Financial Professional directly, or another D.A. Davidson Companies representative at (800) 332-5915.

For European Residents Only
For the purposes of European data protection laws, we are the data controller of your personal information collected on D.A. Davidson Companies' public sites. This means that we are responsible for, and control the processing of, your personal information.

Personal information about our customer is held and processed by D.A. Davidson Companies as described in this Privacy Notice and to the extent necessary for D.A. Davidson to fulfil its legal and contractual obligations and where in the legitimate interests of D.A Davidson to provide you with our products and services and for the purposes mentioned above in this Privacy Notice.

Individuals in Europe have certain data subject rights which may be subject to limitations and/or restrictions.

- You have the right to access, rectify and erase your personal information. You also have the right to ask us to restrict the purpose or to object to the processing of your personal information as well as a right to data portability.
- You may have the right to lodge a complaint about the processing of your personal information. Individuals in Europe may lodge a complaint about the processing of their personal information with their local data protection authority.

Personal information we collect may be transferred to and stored within the United States. Our site is subject to laws in the United States, which may not afford the same level of protection as those in your country. By submitting your personal information to us, you consent to the transfer of your personal information to us and other recipients described in this Privacy Notice that are located in countries outside of the European Economic Area including in the United States. You may withdraw your consent at any time. The withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice.

If you wish to exercise any of your rights under this Privacy Notice, please send us your request via email to GDPR-DPO@daco.com. We may update our Privacy Policy as necessary and reserve the right to amend this privacy notice at our discretion and at any time.
Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained in D.A. Davidson Companies’ Privacy Policy and applies solely to California residents. We adopt this notice to comply with the California Consumer Privacy Act of 2010 (“CCPA”), California Civil Code §§ 1798.100 et seq. Any terms defined in the CCPA have the same meaning when used in this Privacy Notice for California Residents.

Information Collected
We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Identifiers.</td>
<td>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</td>
</tr>
<tr>
<td>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</td>
<td>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</td>
</tr>
<tr>
<td>C. Protected classification characteristics under California or federal law.</td>
<td>Age (over 40), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex, veteran or military status.</td>
</tr>
<tr>
<td>D. Commercial information.</td>
<td>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</td>
</tr>
<tr>
<td>E. Internet or other similar network activity.</td>
<td>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</td>
</tr>
<tr>
<td>F. Geolocation data.</td>
<td>Physical location or movements.</td>
</tr>
<tr>
<td>G. Professional or employment-related information.</td>
<td>Current or past job history.</td>
</tr>
<tr>
<td>H. Inferences drawn from other personal information.</td>
<td>Profile reflecting a person's preferences as it relates to a client relationship.</td>
</tr>
</tbody>
</table>

Personal information does not include:
- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Sources of Personal Information
We obtain the categories of personal information listed above from the following categories of sources:
- Directly from you or D.A. Davidson Companies. For example, from information that you provide us in the course of our providing financial services to you or via the Contact Us form on our website.
- Indirectly from third party vendors. For example, through information we collect from third party data aggregators whom you have authorized to access your account information.
- Directly and indirectly from activity on our website http://www.dadavidson.com. For example, from information submitted through our website or website usage details collected automatically.
Use of Personal Information
We may use or disclose the personal information we collect for one or more of the following business purposes:

- to fulfill or meet the reason for which the information is provided; For example, if you provide us with personal information in conjunction with an order, we will use that information to process the order;
- to provide you with information, products or services that you request from us;
- to provide you with email alerts, event registrations and other notices concerning our products or services, or news, that may be of interest to you;
- to improve our website and present its contents to you;
- to test, research, analyze, and develop new products and services;
- to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law; in cases involving danger of death or serious physical injury to any person or other emergencies;
- to protect our rights or property or the safety of our customers or employees;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of our products and services;
- to advance or defend against complaints or legal claims in court, administrative proceedings, and elsewhere;
- to a third party that you have authorized to verify your account information;
- to outside auditors and regulators;
- with your consent; and
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we already may have collected for materially different, unrelated, or incompatible purposes without first providing you with notice.

Sharing Personal Information
We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- A: Identifiers
- B: California Customer Records
- C: Protected classification characteristics under California or federal law.
- D: Commercial information
- E: Internet or network activity
- F: Professional or employment-related information.

We disclose your personal information for a business purpose to the following entities:

- D.A. Davidson Companies;
- Service providers; and
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold or licensed any personal information.

Your Rights and Choices
The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights
You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
Deletion Request Rights
You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:
1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights
To exercise the access, data portability, and deletion rights described above, please submit a consumer request to us at:

D.A. Davidson Companies
Attn: Compliance / CCPA Privacy Request
8 Third Street North
P.O. Box 5015 59403
Great Falls, MT 59401
CCPA@dadco.com Tel: (800) 332-5915

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a consumer request related to your personal information. You may also make a consumer request on behalf of your minor child.

To submit a request, you must:
- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, including your full name, date of birth, address, email address, and phone number; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You may only make a consumer request for access or data portability twice within a 12-month period.

Response Timing and Format
We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if any.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination
We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:
- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
Our CCPA Privacy Policy applies to the following D.A. Davidson Companies subsidiaries:
  - D.A. Davidson & Co.
  - Davidson Investment Advisors, Inc.
  - D.A. Davidson Trust Company
  - Davidson Fixed Income Management, Inc.

Changes to Our Privacy Notice
We may update our Privacy Policies as necessary, so please check back periodically for changes. You will be able to see that changes have been made by reviewing the effective date at the end of the Privacy Policy. We reserve the right to amend this privacy notice at our discretion and at any time.

Contact Information
If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under the CCPA, please do not hesitate to contact us at:

D.A. Davidson Companies
Attn: Compliance / CCPA Privacy Request
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Great Falls, MT 59401
CCPA@dadco.com Tel: (800) 332-5915