



## **YOUR PRIVACY IS IMPORTANT TO US**

This notice describes the privacy practices of Sorrento Pacific Financial, LLC (SPF). Protecting your privacy is very important to us. We value your trust and we want you to understand what information we collect, how we protect it, and how we use it. Our Privacy Policy treats your nonpublic personal information ("personal information") with care, integrity and respect for your privacy.

### ***Information We Collect***

We collect and retain information about you to identify and communicate with you, to provide you with products and services that you have requested and to help us respond to your questions. We collect nonpublic personal information from the following sources:

- Information we receive from you on applications and other forms (for example, name, address, social security number, assets, and income);
- Information about your transactions from us, our affiliates or nonaffiliated third parties such as our clearing firm, mutual fund companies, insurance companies, money managers, and/or your prior brokerage firm (in the case of an account transfer),
- Information obtained when verifying the information you provide on an application or other forms (this may be obtained from other institutions where you conduct financial transactions); and
- In some cases, we may collect information from consumer reporting agencies.

We have procedures to ensure that your information is maintained in a commercially reasonable manner so that it is accurate, current, and complete. Keeping your information secure is one of our most important responsibilities. We restrict access to nonpublic personal information about you to those employees and agents who need to know the information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your non-public personal information. We also have procedures to ensure that requests to correct inaccurate or incomplete information are acted upon in a timely manner.

### ***Disclosure of Personal Information to Non-Affiliated Third Parties***

We do not disclose or sell personal information about you or our former customers to nonaffiliated third parties, except as permitted or required by law or regulation. We may disclose all of the information we collect to companies with whom we have a financial services agreement to offer financial products and services to you.

### ***For Clients of Independent Representatives (No Financial Institution Relationship)***

In the event that your Representative leaves SPF, we may provide your personal information to the Representative and his/her new firm in order to facilitate the transfer of your account(s) to the new firm so that you may continue to be served by your Representative. We only disclose information as permitted or required by law.

If you do not want us to share information, other than as required by law, with third parties such as a new firm, please clearly indicate your request in writing by notifying us at Attn.: Compliance, Sorrento Pacific Financial, LLC, 10455 Sorrento Valley Road, Suite 101, San Diego, CA 92121.

#### ***Disclosure of Personal Information in Other Circumstances***

We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your personal information. We protect your account information by placing it on the secure portion of our website. Our servers have been enabled with Secure Sockets Layer (SSL) technology to prevent unauthorized parties from viewing your personal information. In addition, we employ GeoTrust digital certificate services to authenticate that you are connecting to our server(s). Access to your personal information is limited to those employees, registered representatives and agents who may need to know that information to provide products or services to you. They are required to maintain the confidentiality of all customer information.

Although privacy regulations generally prohibit the sharing of personal information, we may share the following information pursuant to specific exceptions:

- Disclosures made pursuant to a written agreement that prohibits the third-party from disclosing or using the information for purposes other than those in the agreement.
- Disclosures that are necessary to effect, administer or enforce a transaction for a financial service or product that the client requests or authorizes.
- Disclosures to credit agencies.
- Disclosures permitted or required by law in order to prevent fraud, control risk, resolve complaints or as otherwise required by law.

The above disclosures are permitted under the Regulations of the Securities and Exchange Commission. There may be some states in which we do business that would prevent us from disclosing personal information in one or more of the situations described above, without a right to opt-out or a requirement to opt-in. We will respect the state requirements as they may apply to our affected customers.

When we share confidential customer information with a third party, these companies are contractually obligated to keep the information that we provide to them confidential and use the information only for the services required and as allowed by applicable law or regulation, and are not permitted to share or use the information for any other purpose. That is, we require such third parties to agree to safeguard personal information regarding our customers in accordance with our own privacy policies.

#### ***Availability of Disclosure of Privacy Policy***

Our Privacy Policy is available at our branch office and our privacy website at: [www.pdspfprivacy.com](http://www.pdspfprivacy.com). We will reaffirm this policy annually, in writing, unless you agree to receive it electronically through our website. We reserve the right to make changes to this policy at any time. We will notify you in writing before we make changes that affect the way we collect or share your information.

SPF policies and procedures do NOT permit any SPF registered individual to accept a check from a client that is made payable to the representative or to their business entity for any investment purposes. The only exception to this is for payment of financial planning fees to an approved Registered Investment Advisor. Please refer to Important Information Before You Invest located at [www.pdspfdisclosure.com](http://www.pdspfdisclosure.com).

If you have any questions, you may contact our Legal and Compliance Department at (858) 805-7900.