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## PRIVACY POLICY

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Carty & Company is a general securities dealer/broker founded in 1970. Over the years, our range of financial products and services has expanded as the company has grown.

Today Carty & Company has over 60 employees, servicing thousands of clients all over the country. Carty & Company strives to serve every client as if they were our only client. Carty & Company realizes that investors have a choice, so our brokers make it their #1 priority to help their customers make investment decisions that are suited to their individual needs and wants. In an ever growing crowded marketplace, Carty & Company realizes to stand out and continue to exist, customer service, honesty, integrity and know how are all musts. We believe that "honesty" and "integrity" are not just platitudes, but necessary tools to successful prospecting and retention of clients. With our continuing philosophy of purchasing inventory with our customers in mind, we endeavor to give our clientele a full range of financial products at the best available prices.

## SECURITY POLICY

We protect our customer's privacy by restricting access to personal and account information to those employees who need to know that information to provide you products and services. We also maintain special electronic and procedural safeguards to protect the confidentiality of your information.

## SOURCES OF THE INFORMATION WE COLLECT

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or other;
- Information we receive from a consumer reporting agency.

## DISCLOSURE POLICY

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law.

In the event our privacy policy is changed, you will be notified. We will notify our customers of our privacy policy upon opening an account and annually thereafter. If our customer

relationship ends, we will continue to follow this policy.

We hope this policy statement as to how we use your personal and financial information is helpful. As always, we value your business and thank you for giving us the opportunity of earning and keeping your trust.

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## IMPORTANT CUSTOMER INFORMATION

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### FINRA BROKER CHECK

In accordance with FINRA Investors Education and Protection Rule, we are providing our clients with the following information:

- FINRA Broker Check Public Disclosure Hotline telephone number is (800)289-9999
- FINRA Internet website address is [www.finra.org](http://www.finra.org)

A copy of an investor brochure that includes information concerning the FINRA Public Disclosure Program can be obtained by calling the Public Disclosure Hotline or keying in on the FINRA website.

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## SECURITIES INVESTOR PROTECTION CORPORATION (SIPC)

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To obtain information about the Securities Investor Corporation (SIPC) by phone, email or regular mail.

Securities Investor Protection Corporation  
805 15<sup>th</sup> Street, N.W. Suite 800  
Washington, DC 20005-2215

Tel: (202)371-8300

Fax: (202)371-6728

Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)

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## ANTI-MONEY LAUNDERING REQUIREMENTS

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### THE USA PATRIOT ACT

The USA PATRIOT Act, signed by President Bush last year, is designed to detect, deter and punish terrorists in the United States and abroad. The Act imposes new anti-money laundering requirements on brokerage firms and financial institutions. By April 24, 2002, all brokerage firms were required to have new, comprehensive anti-money laundering programs.

To help you understand these efforts, we want to provide you with some information about money laundering and our steps to implement the USA PATRIOT Act.

### WHAT IS MONEY LAUNDERING?

Money laundering is the process of disguising illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including illegal arms sales; drug trafficking, robbery, fraud, racketeering, and terrorism.

### HOW BIG IS THE PROBLEM AND WHAT IS IT IMPORTANT?

The use of the U.S. financial system by criminals to facilitate terrorism or other crimes could well taint our financial markets. According to the U.S. State Department, one recent estimate puts the amount of worldwide money laundering activity at \$1 trillion a year.

### WHAT ARE WE REQUIRED TO DO TO ELIMINATE MONEY LAUNDERING?

Under new rules required by the USA PATRIOT Act, our anti-money laundering program must designate a special compliance officer, set up employee training, conduct independent audits, and establish policies and procedures to detect and report suspicious transactions and ensure compliance with the new laws. As part of our required program, we may ask you to provide various identification documents or other information. Until you provide the information or documents we need, we may not be able to open an account of effect and transactions for you.

*We thank you for your patience and hope that you will support us in our efforts to deny terrorist groups access to America's financial system*