

W.G. NIELSEN & CO.

INVESTMENT BANKING
MEMBER FINRA

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W.G. Nielsen & Co.

Notice of Privacy Policy and Practices

W. G. Nielsen & Co. (“WGN”) recognizes and respects the privacy expectations of our customers.¹ We provide this notice to you so that you will know what kinds of information we collect about our customers and the circumstances in which that information may be disclosed to third parties who are not affiliated with WGN.

Collection of Customer Information

We collect nonpublic personal information about our customers from the following sources:

- *Account Applications, advisory agreements and other forms*, which may include a customer’s name, address, social security number, and information about a customer’s investment goals and risk tolerance;
- *Account History*, including information about the transactions and balances in a customer’s account; and
- *Correspondence*, written, telephonic or electronic, between a customer and WGN or service providers to WGN.

Among other sources, we may collect this information through Internet web sites.

Disclosure of Customer Information

¹ For purposes of this notice, the terms “customer” or “customers” include both (i) individuals who have a continuing client relationship with the firm (e.g., by having an advisory contract with the firm or by holding an investment product through the firm) and (ii) individuals who provide nonpublic personal information to the firm, but who do not have a continuing relationship with the firm (e.g., an individual who provides such information in deciding whether to become a client, whether or not the individual establishes a continuing relationship with the firm).

We may disclose all of the information described above to certain third parties who are not affiliated with the firm under one or more of the following circumstances;

- *As Authorized* – if you request or authorize disclosure of the information.
- *As Required by Law* – for example, to cooperate with regulators or law enforcement authorities.
- *As otherwise Permitted by Law* – for example, sharing information with companies that maintain, process or service customer accounts or financial products and services or effect, administer or enforce customer transactions is permitted. Among other activities, we may share information with broker-dealers in order to execute customer trades or with custodians that hold securities on behalf of customers. We believe that sharing of information for these purposes is essential to providing customers with necessary or useful services with respect to their accounts.
- *Under Joint Agreements* – we may also share information with companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements.
- Security of Customer Information

We require service providers to the firm:

- To maintain policies and procedures designed to assure only appropriate access to information about customers of the firm;
- To limit the use of information about the firm's customers to the purposes for which the information was disclosed, or as otherwise permitted by law; and
- To maintain physical, electronic and procedural safeguards that comply with federal standards to guard non-public personal information about our customers.

We will adhere to the policies and practices described in this notice regardless of whether you are a current or former client of the firm.

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If you have questions regarding these policies, please contact us by writing to W. G. Nielsen & Co., 3200 Cherry Creek S. Drive, Suite 470, Denver, CO 80209, Attention: Thomas Campbell, or by calling 303-830-1515.