

# **Ladenburg Thalmann Privacy Policy**

**Updated August 2, 2022**

**Ladenburg Thalmann & Co., Inc., and Ladenburg Thalmann Asset Management, Inc. (“we,” “our,” “us,” or “Ladenburg”) care about your privacy and recognize the importance of protecting personal information. This Privacy Policy describes the types of personal information we may collect, including during your visit to our websites (e.g., [www.ladenburg.com](http://www.ladenburg.com) , and [ltam.com](http://ltam.com) ,) (“Sites”), and when you communicate or interact with us or seek or use our products and services; how we use personal information; how we protect personal information; and how you can exercise options regarding personal information. Please note that some of our Sites have their own specific privacy policies. When that is the case, this policy applies in addition to those policies.**

**By visiting our Sites, or using our products or services, you consent to our collection and use of personal information as described in this policy and in the Terms and Conditions that apply. If you do not agree to this policy or our Terms of Use, please do not use our Sites, products, or services.**

## **1. Changes to this Policy**

**We may revise this policy at our discretion and will update it periodically. We will post any material changes on this page and update the “Last Updated” date, so be sure to check back periodically. For material retroactive changes, we will notify you consistent with the law. Your continued use of our Sites and services after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.**

## **2. Personal Information We Collect and Purposes for Which We May Use It**

**The personal information we may collect about you depends on our relationship with you. For instance, if you are a client of ours, we will collect information about you to open and service your accounts. If you apply for a job with us, we may collect information to consider your application. If you are an employee, we may collect information for human resources-related purposes. If you use our Sites, we may automatically collect information from your use of the Sites (see “Marketing and Website Analytics” below).**

**For purposes of this policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked,**

directly or indirectly, with a particular consumer or household. It does not include de-identified or aggregate information, or public information lawfully available from governmental records.

Below we categorize types of personal information we have collected in the last 12 months. Depending on our relationship with you, and to the extent consistent with law, we may continue to collect these types of personal information and use it for the purposes listed further below. Please note that the examples of the types of information within these categories that may qualify as personal information are not intended to be comprehensive and that there may be overlap between categories.

#### Categories of Personal Information

- *Contact information and other personal identifiers*, such as name, postal and email address, phone number, unique personal identifier, account name, registration number, tax identification number, Social Security number, driver's license number, passport number, and similar identifiers
- *Financial, commercial and benefits information*, such as records and information about personal property or financial accounts, investments, products, and services; purchasing or consuming histories or tendencies; investment objectives, risk tolerance, time horizon, assets, holdings and financial interests, income and compensation, expenses, tax information, transaction history, investment experience; other account information; information on savings, insurance, and retirement; other benefits-related information; and other commercial and financial information
- *Internet or electronic activity information and device and online identifiers*, such as IP address, online identifier or device ID, or other similar identifiers; information regarding interaction with a website, device, database, or application, including time and duration of internet and network connections; browsing history; and calls and emails sent and received
- *Demographic, protected classification, and association information*, such as date of birth/age, sex, marital status, race, gender, ethnicity, citizenship and visa status, military or veteran status; association-related information, such as whether an individual is related to someone who is employed in the securities industry, information about dependents, beneficiaries, and parties related to an account, emergency contact information; and disability and health-related information
- *Audio, electronic, visual, or similar information*, including photographs, CCTV footage and other video event recordings, and voicemail and other telephone recordings (e.g., for call center support lines)
- *Education and professional background information*, such as degrees, licenses, professional designations, or certificates sought or obtained; training records, transcripts, performance and talent management information; resumes, work history, firm element, job descriptions; references; compensation, bonus, stock-option information, and similar information; membership in professional bodies, appointments, gross dealer concession, outside business

activities; publications and work product; discipline, conduct, absence records; and criminal history

- *Inferences* drawn from personal information to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance, and business development and practice analysis
- *Biometric information*, specifically fingerprint information for Ladenburg Group personnel and representatives
- *Other personal information provided to us or stored on our systems*, such as information provided by email or in a phone call

#### **Uses of Personal Information**

- Offering and providing products and services (including opening and servicing accounts, conducting transactions, communicating, fulfilling requests and responding to questions, providing information and events, making suitability determinations, conducting administrative and managerial tasks associated with our client services, etc.), marketing our products and services, connecting individuals with other products and services
- Operating our business; fulfilling contractual obligations; ensuring the security and sufficiency of our networks, systems, products, services, property and personnel; monitoring, assessing, designing, and improving our operations, products, and services; managing risk
- Recruiting, hiring, performance and talent/practice management
- Managing and administering human resources services, personnel, benefits, and compensation
- Supervising and providing compliance, educational, and licensing-related services and practice support to representatives
- Conducting internal investigations; preventing fraud; addressing disciplinary matters; ensuring compliance with legal, regulatory and policy requirements; responding to lawful requests; establishing or defending legal claims or allegations; protecting property, personnel, or members of the public; and other legitimate business and commercial purposes consistent with the context in which the personal information was collected<sup>1</sup>

With respect to each of the categories of data above, we may also share personal information with any person to whom we may transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or to any person who is otherwise deemed to be our successor or transferee. We may also collect and use information as described to you when collecting the information.

### **3. Sharing Personal Information**

We have in the last 12 months disclosed each of the categories of personal information above to parties outside of Ladenburg for a business purpose and may continue to do so.

**We may share personal information internally and with the following types of parties:**

- ***Service providers, contractors, and vendors***, including to process transactions, maintain accounts, and provide information technology, marketing, and recruiting and human resources related services
- ***Third parties and non-affiliates***, such as your financial professionals, representatives, other financial institutions, credit bureaus, product sponsors, and business contacts and partners related to the provision or offering of products or services, human resources, and business operations, management, and administration
- ***Governmental authorities and other third parties***, such as self-regulatory organizations, to comply with applicable laws and legal requirements or in response to court orders, subpoenas, government inquiries, other legal processes, to defend against claims and allegations, or to protect property, personnel, or members of the public
- ***Members of the public and our clients*** when permitted by law, for instance, items of interest pertaining to our business (e.g., photographs taken at our events)
- ***Other parties*** to which you direct us to disclose personal information, or to which we inform you we may disclose your data, or to which we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or to any person who is otherwise deemed to be our successor or transferee

**Please note that you may interact with a representative, other financial institutions, or other third parties (sometimes referred to as non-affiliates, which are companies not related to Ladenburg by common ownership or control), or direct us to share information with such parties as we provide products or services to you. Ladenburg may not control the data practices of such parties, and we recommend you review any applicable privacy policies for information about these parties' data practices.**

#### **4. Sources of Personal Information**

**We collect or receive the categories of personal information above from:**

- **Communications and interactions with individuals seeking to obtain or using our products and services or their agents and representatives, or other persons communicating or otherwise interacting with us**
- **Automated collection through our Sites, services, products, applications, databases, devices, information systems and networks, including through cookies and similar technology**
- **Ladenburg employees and other personnel**
- **Representatives**
- **Other financial institutions, product sponsors, clearing firms, intermediaries, business partners and contacts**

- Service providers, contractors, vendors, credit reporting agencies, background check companies
- Individuals interested in positions with us or those referring them to us, such as recruiters or referral sources
- Subscription information, research, and analytic services
- Public and government sources and records
- Records and property to which we have lawful access, e.g., device inventories for company property or documents stored on our systems

## 5. Marketing and Website Analytics

**Cookies and Marketing:** We may use data collected from our Sites to make you personalized offers relating to our products and services, either on our Sites or on third-party sites that you visit through the use of cookies and similar technologies in conjunction with other entities (e.g., Google Ads and social media partners). A cookie is a file with a small amount of data that is sent to your browser from a web server and stored on your device. We endeavor in good faith to adhere to the Digital Advertising Alliance's Principles. If you are interested in learning more about online behavioral advertising, or opting out of this type of advertising, we encourage you to visit one of the advertising industry-developed opt-out pages, such as <https://youradchoices.com/> or [aboutads.info](https://aboutads.info). (Note, however, that these and other links we provide in this policy to other entities' sites are sites over which we have no control.) For more information on GoogleAds, and the information Google collects through this service and cookies, as may be amended from time to time, please refer to the Google links below.

**Analytics:** Our Sites may also use cookies to track website behavior and place cookies that may allow us to connect that information to other information that we have about you and track how visitors access or view our Sites. We use this information to understand what pages and features of our Sites visitors find useful. We use Google Analytics and Eloqua for these purposes. For more information about Google, the information it collects, and Google Analytics' Opt-Out Browser Add-On, please visit: <https://policies.google.com/privacy>, <https://policies.google.com/technologies/partner-sites>; <https://tools.google.com/dlpage/gaoptout/> For more information on Eloqua, please visit: <https://www.oracle.com/marketingcloud/opt-status.html> and <https://www.oracle.com/legal/privacy/privacy-policy.html>.

We do not maintain joint marketing arrangements or formal agreements between nonaffiliated financial companies that together market financial products or services to our clients or potential clients.

## **6. Individual Rights with Respect to Personal Information**

### **Rights Under Federal Law**

Federal law gives consumers and customers, as those terms are defined in the GrammLeachBliley Act (“GLBA”), the right to limit some but not all sharing of their information by financial institutions like Ladenburg. Federal law also requires us to tell you how we collect, share, and protect your personal information. For information on the manner in which we may share your information if you are a client of Ladenburg, please see our privacy notices:

- <https://www.ladenburg.com/policies-disclosures/privacy-disclosure>
- <http://www.ltam.com/LTAM-Privacy-Policy.pdf> You may opt out of sharing as explained in these notices as follows:
- Please contact your Registered Representative or Call us at 800 215-1570 or contact [CCPA@ladenburg.com](mailto:CCPA@ladenburg.com)

### **Rights Under State Law (California)**

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 (“CCPA”) regarding your personal information, as described in this section.

#### ***What is Covered by this Section of the Privacy Policy?***

Much of the personal information that Ladenburg collects is exempt from the rights provided by CCPA. The rights under the CCPA described below do not apply, for instance, to personal information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. As a general matter, those laws apply to nonpublic personal information about individuals who obtain financial products or services primarily for personal, family, or household purposes. The CCPA also exempts from most of its provisions, including the privacy policy notification requirements, certain information processed in the business-to-business context (e.g., information about an individual acting in his or her capacity as a representative of a company) and information about employees, job applicants, and contractors when processed in that context. This section (6.B) therefore does not cover information falling within the scope of these exemptions or to which the CCPA’s relevant provisions do not apply.

### **Access and Deletion Rights Under the CCPA**

#### **i. Right to Request Disclosure of Personal Information We Collect and Share (Access Rights)**

**Individuals whose personal information is covered by the CCPA have a right to request that Ladenburg provide the following information:**

**The categories of personal information that Ladenburg has collected about you**

**The categories of sources from which Ladenburg collected the personal information**

**The business or commercial purposes for which Ladenburg collected and/or sold the personal information**

**The categories of any third parties with which Ladenburg shared the Personal information**

**The specific pieces of personal information Ladenburg collected over the past year**

**Such individuals may also submit a request for the following additional information:**

**The categories of personal information, if any, Ladenburg has sold about you, categories of third parties to which Ladenburg sold that personal information, and the categories of personal information sold to each type of third party**

**The categories of personal information that we have disclosed for a business purpose**

**Our responses to any of these requests will cover the 12-month period preceding our receipt of the request.**

**ii. Right to Request the Deletion of Personal Information. We have Collected from You (Deletion Rights)**

**Individuals whose personal information is covered by the CCPA may also request that we delete personal information covered by the CCPA that we maintain. Upon receiving and appropriately verifying such a request, Ladenburg will delete the personal information, unless that information is necessary for Ladenburg to: complete the transaction for which we collected the information; provide you with a good or service you requested; perform a contract Ladenburg entered into with you; detect security incidents; maintain the functionality or security of Ladenburg systems; comply with or exercise rights provided by the law; or use the information internally in ways that are comparable with the context in which you provided the information to Ladenburg or that are reasonably aligned with expectations based on your relationship with Ladenburg, among other things. We may also retain information where another exception to the deletion requirements in Cal. Civ. Code §**

1798.105(d) applies. Please note that if you request that your personal information be deleted, you may no longer be able to access or use certain parts of the Sites.

### **iii. How to Exercise Access and Deletion Rights**

To exercise these CCPA rights, please visit [www.ladenburg.com](http://www.ladenburg.com) or [www.ltam.com](http://www.ltam.com) FOR CCPA CONSUMER REQUESTES or contact LADENBURG at 800 215-1570 or [CCPA@ladenburg.com](mailto:CCPA@ladenburg.com). You may also submit a request to Ladenburg in person through the representative that offered you Ladenburg services.

### **iv. Our Processes for Responding to CCPA Requests**

***Verifying requests:*** Depending on the nature of your request, we may ask you for additional information to verify your request and identity and a declaration attesting to your identity, signed under penalty of perjury.

***Timeline for responding:*** We will respond to requests for access or deletion as soon as practicable and, in any event, generally within 45 days after receiving your request. We may extend this period to 90 days in some cases.

***Using an agent:*** You may designate an agent to submit a request on your behalf.

***Requests for household information:*** There may be some types of personal information that can be associated with a household. Requests for access or deletion of household personal information must be made by each member of the household.

### ***Sales of Information***

We do not and will not sell personal information, nor have we sold any of the categories of personal information described in Section 2 above in the last 12 months.

### ***Non-discrimination***

We are committed to complying with the law. If you exercise any of the rights explained in this policy, we will continue to treat you fairly.

### ***Accessibility***



Ladenburg is committed to ensuring that our communications, such as our Sites, are accessible to individuals with disabilities. To submit accessibility related requests or report barriers to accessibility, please contact your Registered Representative or contact us at 800 215-1570.

For job applicants please contact us at (602) 744-3159 or contact [ApplicantAccessibility@advisorgroup.com](mailto:ApplicantAccessibility@advisorgroup.com).

## **7. Modifying Account Information**

If you have an account with us and you would like for us to change or update your information, please contact your Registered Representative or contact us directly at 800 215-1570.

## **8. Do Not Track Requests**

Currently there is no industry standard for “Do Not Track” signals, which are options on your browser that tell website operators that you do not wish to have online activity tracked. Because there is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals.

## **9. Minors' Information**

The Sites are not directed to minors under the age of 18, nor do we sell information about minors. If we learn that we have erroneously collected personal information of a child under 18, we will take steps to delete such information from our files as soon as possible.

## **10. How We Protect Personal Information**

Ladenburg is committed to the security of your personal information. To protect your personal information from unauthorized access and use, we implement and maintain reasonable security measures that are intended to maintain the confidentiality of personal information. However, no security measures are infallible and we cannot and do not guarantee that our safeguards will always work. Please always use caution when transmitting information, including over the internet, use strong and unique passwords that you do not also use on other online services, and notify us immediately of any concerns regarding your account or passwords.

## **11. International Transfers of Data**

**We are based in the United States. The information you submit to us and that we collect as a result of using our Sites will be transferred to the United States. By using our Sites, products and services, you consent to the collection, international transfer, storage and processing of your information. If it is illegal to access our Sites or transfer your data to the United States, please do not use our Sites.**

## **12. Third-party Links**

**Our Sites may contain links to third-party websites. Please be aware that we are not responsible for the privacy practices of other websites. This Site offers no guarantees about the safety or suitability of websites featured on third-party links, and users who choose to follow such links do so at their own risk.**

## **13. How to Contact Us**

**If you have any further questions, please contact your Registered Representative or Ladenburg Thalmann directly at 800 215-1570 or [CCPA@ladenburg.com](mailto:CCPA@ladenburg.com)**

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