

## PRIVACY POLICY

### Privacy of Personal Information

We recognize that your personal information is important to you. Elmcore Securities LLC has developed the following privacy standards regarding this information:

- Elmcore Securities LLC does not sell your personal information;
- Elmcore Securities LLC does not disclose any personal information about you to anyone, except as permitted by law;
- Elmcore Securities LLC may use third-party service providers for its internal purposes. Any third-party service providers that Elmcore Securities LLC may use will be bound by obligations of confidentiality not to disclose the information provided by Elmcore Securities LLC about its customers and may not use this information for any purpose other than performing the particular service; and,
- We use the e-mail addresses you provide to us to send information and other important administrative information to you.

Any Non-Public Personal Information will generally be derived from information we receive from you (written or otherwise), information about your securities transactions with Elmcore Securities LLC or other advisors (if applicable), and other financial services providers that may be providing financial services to you.

Elmcore Securities LLC offers an opt-out provision in its Privacy Notice to limit our sharing. Your choice to limit marketing offers from our affiliates will apply until you tell us to change your choice.

### Disclosing Information in other Situations

Under certain circumstances, we may be required by law to disclose your personal information. Elmcore Securities LLC may also disclose personal information to protect its legal rights or to enforce our client agreement. We may disclose certain customer information to credit bureaus and similar organizations, and otherwise when permitted by law. For example, this may include:

- A disclosure in connection with a subpoena or similar legal process;
- A fraud investigation;
- Recording of deeds of trust and mortgages in public records;
- An audit or examination; and/or,
- The sale of your account to another financial institution.

### Information Security

We are committed to preventing others from authorizing access to your customer information, and we maintain procedures and technology designed for this purpose. We take several steps to protect the customer information we have about you, including the following:

- We maintain physical, electronic, and procedural safeguards to protect your information;
- We restrict access to information about you to those employees, affiliated entities, and third-party service providers who need to know that information to provide you with the best possible products and services;
- We require outside companies and independent contractors to whom we provide customer information for marketing, servicing, or processing purposes to enter into a confidentiality agreement that restricts the use of such information to be used for specific purposes as intended, and prohibits the independent use of such information;
- We update and test our technology on a regular basis in order to improve the protection of customer information; and,
- We have internal procedures that limit access to customer information to only those members who are considered "authorized" personnel.

If you have any questions about your personal or account information or about Elmcore Securities LLC privacy policies and practices, please feel free to contact us at (312) 488-4008.

## FINRA PUBLIC DISCLOSURE INFORMATION

FINRA Conduct Rule 2267 requires the following information be provided to you: (1) the FINRA BrokerCheck toll-free hotline number is (800) 289-9999; (2) the FINRA Website address is: [www.FINRA.org](http://www.FINRA.org); and, (3) that FINRA has an investor brochure available that describes FINRA's BrokerCheck. Furthermore, the FINRA BrokerCheck online database is also available at: [www.brokercheck.finra.org](http://www.brokercheck.finra.org).

## IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT AND VERIFICATION OF IDENTITY

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you:

- When you open an account, we will ask for your name, address, date of birth, identification number (i.e., taxpayer, passport, etc.), and other information that will allow us to identify you.
- We may also ask to see your driver's license or other identifying documents.

## TRUSTED CONTACT PERSON

Elmcore Securities LLC, or an associated person of Elmcore Securities LLC, is authorized to contact your trusted contact person and disclose information about your account to address possible financial exploitation, to confirm the specifics of your current contact information, health status, or the identity of any legal guardian, executor, trustee, or holder of a power of attorney, or as otherwise permitted by FINRA Rule 2165.

## FINRA MANUAL

The FINRA Manual contains complete information about the guidelines that affect how firms conduct business, including the By-Laws, Conduct Rules, Code of Procedure, Uniform Practice Code, and relevant SEC and Federal Reserve Board rules. The FINRA Manual is available on FINRA's website at: [www.finra.com/plinet.com](http://www.finra.com/plinet.com). In the event you are unable to gain online access to the FINRA Manual, Elmcore Securities LLC will provide online access to the FINRA Manual at our office.



## ELMCORE SECURITIES LLC'S BUSINESS CONTINUITY PLANNING

Elmcore Securities LLC has developed a Business Continuity Plan explaining how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption, you cannot contact us as you normally would, please contact us at +1.312.488.4008 or info@elmcore.com. Additionally, updates regarding our operational status and alternate contact information will be posted on our website at www.elmcore.com.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical suppliers, contractor, bank, and counterparty impact; regulatory reporting; and, assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only within our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. If a disruption occurs to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours. If a disruption occurs that affects our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 48 hours. If a significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at +1.312.488.4008 or info@elmcore.com.

### SIPC DISCLOSURE

Elmcore Securities LLC is a member of the Securities Investor Protection Corporation ("SIPC"), which provides account protection for the net equity of a customer's funds and securities positions. SIPC provides \$500,000 of primary net equity protection, including \$250,000 for claims for cash ("SIPC Coverage"). Account protection applies when a SIPC member firm fails financially and is unable to meet its obligations to its securities customers, but does not apply to losses from the rise or fall in the market value of investments or to SIPC ineligible assets such as futures, foreign exchange transactions, or any investment contracts that are not registered as securities. For more information about SIPC Coverage, including the SIPC brochure, please visit: <http://www.sipc.org> or contact SIPC directly at:

#### Securities Investor Protection Corporation

1667 K St. N.W., Suite 1000  
Washington, D.C. 20006-1620  
Phone: (202) 371-8300  
Fax: (202) 223-1679  
Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)  
Website: <http://www.sipc.org/>

### CUSTOMER COMPLAINTS

All notices, inquiries or other communications related to customer complaints of Elmcore Securities LLC shall be directed in writing to 500 W. Madison Street, Suite 1000, Chicago, IL 60661, Attention: Chief Compliance Officer, or to such other person or address as Elmcore Securities LLC shall furnish. Customers may also direct such customer complaints to the following parties:

**FINRA Investor Complaint Center**  
9509 Key West Avenue  
Rockville, MD 20850-3329  
Phone: (240) 386-4357  
Fax: (866) 397-3290  
Website:  
<http://www.finra.org/investors/investor-complaint-center>

**Securities and Exchange  
Commission Complaint Center**  
100 F Street, NE  
Washington, DC 20549-5990  
Phone: (800) 732-0330 (toll-free)  
Fax: (202) 772-9295  
Website: [www.investor.gov](http://www.investor.gov); or  
<https://www.sec.gov/complaint.shtml>

**Illinois Secretary of State  
Securities Division**  
69 West Washington Street  
Suite 1220  
Chicago, Illinois 60602  
Phone: (312) 793-3384  
Website:  
<https://www.cyberdriveillinois.com/>

FINRA has developed a toll-free number that senior investors can call to get assistance from FINRA or raise concerns about issues with brokerage accounts and investments:

**Senior Helpline: (844) 574-3577, Monday through Friday, 9:00 AM EST – 5:00 PM EST**

Please be aware that filing a customer complaint is not the same as submitting for an arbitration claim. To start an arbitration or mediation or for more information about arbitration or mediation, please visit the Arbitration & Mediation section of FINRA's website at: [www.finra.org/arbitration-and-mediation/overview](http://www.finra.org/arbitration-and-mediation/overview).

For any further information regarding these disclosures, please feel free to contact us at (312) 488-4008 or info@elmcore.com.