



## HUGHES & COMPANY

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### HUGHES & COMPANY LLC's PRIVACY STATEMENT

#### Your Privacy is Our Priority

Hughes & Company LLC (“The Company”) is committed to safeguarding the personal information that you provide us. This Privacy Policy describes how we handle and protect personal information we collect about individuals, such as you, who apply for or receive our products and services. The provisions of this notice apply to former customers as well as our current customers.

#### Why and How We Collect Personal Information

When you apply for or maintain an account with the Company, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. The personal information we collect about you includes:

- information you provide to us on applications and other forms, such as your name, address, date of birth, social security number, occupation, assets, and income;
- information about your transactions with us and with our affiliates;
- information we receive from consumer reporting agencies, such as your credit history and creditworthiness, and other entities not affiliated with the Company; and
- Information you provide to us to verify your identity, such as a passport, or received from other entities not affiliated with the Company.

#### How We Protect Personal Information

We limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and help you accomplish your financial objectives, such as providing you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. We maintain physical, electronic, and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone.

#### Sharing Information with Our Affiliates

We may share personal information described above with our affiliates for business purposes, such as servicing customer accounts and informing customers about new products and services, and as permitted by applicable law.

The information we share with affiliates for marketing purposes may include the information described above, such as name, address and account information, but will not include other

credit information, such as credit history appearing on a consumer credit report or net worth and income information appearing on applications for our products and services.

### **Disclosure to Non-Affiliated Third Parties**

In order to support the financial products and services we provide to you, we may share the personal information described above with third-party service providers such as vendors that prepare and mail statements and transaction confirmations or vendors that provide legal and/or compliance consulting. These companies acting on our behalf are required to keep your personal information confidential.

Also, we may disclose personal information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.