

FACTS

WHAT DOES Independence Capital Co. Inc. DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and employment information and Date of Birth
- assets and income and address
- account balances and transaction history

How?

All financial companies need to share **customers'** personal information to run their everyday business. In the section below, we list the reasons financial companies can share their **customers'** personal information; the reasons Independence Capital Co. Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Independence Capital Co. share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

To limit our sharing

- Call 440.888.7000 —our menu will prompt you through your choice(s) **or**
- Visit us online: www.indcap.com

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call 440.888.7000 or go to www.indcap.com

Who we are

Who is providing this notice?

Companies owned by Independence Capital Co. Inc.

What we do

How does **Independence Capital Co.** protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does **Independence Capital Co.** collect my personal information?

We collect your personal information, for example, when you

- open an account or direct us to buy/sell your securities
- provide account information or give us your contact information
- tell us about your investment portfolio

We also collect your personal information from others, such as credit bureaus, affiliates or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include David W. Toetz & Assoc., Inc., Pearl Road Professional Building LLC, Independence Capital Agency Inc., & Dempsey Scheiman & Assoc., Inc.*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Independence Capital Co. Inc. does not share with nonaffiliates so they can market to you*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Independence Capital Co. Inc. does not jointly market.*