



1820 Lancaster Street  
Baltimore, MD 21231

## MEMBER FINRA, SIPC Privacy Disclosure

Pursuant to federal regulations, including the amended Regulation S-P, Lombard Securities Incorporated ("Lombard") has established the following policies with respect to the disclosure of nonpublic, personal information obtained in connection with your opening and maintaining an account with Lombard:

- (i) Any information disclosed on a Customer Account Application Agreement, Margin Agreement, Option Account Application, IRA Application, or any other papers required, or requested, in connection with the opening of an account with Lombard, and any periodic statements of account activity, and trade confirmations, are covered by these policies.
- (ii) Such information may be disclosed to administrative and operational employees of Lombard for the purposes of servicing your accounts and processing your transactions, as well as to your Financial Professional and his/her administrative staff.
- (iii) Such information may be disclosed to any of Lombard's affiliates, including Lombard Agency, Inc., and Lombard Advisers Incorporated.
- (iv) Such information will be disclosed to Lombard's correspondent, First Clearing, and to the money market fund provider in connection with your opening a money market sweep account, or to a non-affiliated investment adviser providing WRAP account services, and members of their staffs, for the purpose of servicing your account.
- (v) Such information, including account numbers, shall not be disclosed by Lombard to other non-affiliates of Lombard, except under the foregoing circumstances:
  - (A) Upon the receipt of a written request or authorization to do, signed by you, the customer(s); or,
  - (B) In connection with an examination of Lombard's books and records by a regulatory organization established under federal or state laws; or,
  - (C) Pursuant to a subpoena issued by a court or arbitration of competent jurisdiction; or,
  - (D) In connection with the submission of an application, signed by you, to purchase an insurance product or mutual fund product.
- (vi) Such information shall be maintained in both hard-copy and electronic format, and shall be accessible to the staff members of Lombard, your Financial Professional, and to staff members of First Clearing, and our money market provider, or their agents. Hard copy documents are not available to non-associated persons, and electronic format is secured by firewalls requiring authorized password(s) to access.
- (vii) Lombard has implemented a written incident response program designed to detect, respond to, and recover from unauthorized access to or use of customer information.
- (viii) In the event of unauthorized access or use of your sensitive information, Lombard will notify you within 30 days of discovery. This notice will include a description of the incident, the types of information involved, and steps you may take to protect yourself.
- (ix) Lombard also requires its service providers to maintain appropriate safeguards and to notify Lombard within 72 hours of any breach involving customer information systems.
- (x) Opt Out Provisions: You do have the right to prevent the disclosure of non-public personal information to non-affiliated third parties - commonly referred to as the right to "opt out". However, this opt out provision does not apply in cases where the information sharing is necessary to provide consolidated statements of account activity, complete a transaction, or service your account, nor does it apply to information disclosed to market products or services offered through joint agreements with another financial institution, e.g., First Clearing, our money market fund provider, and investment advisers with whom Lombard Advisers Incorporated has WRAP fee arrangements. Should you not wish disclosures be made to any of the foregoing financial institutions, or to affiliates of Lombard, or, should you be unable to accept any of the disclosure exceptions specified in Section (v) above, you must notify the firm's Customer Service Department immediately, so that your account may be closed in that Lombard would not be able to service your account under such circumstances.

**Lombard Securities Incorporated Customer Service**  
**410.342.1300**  
**800.755.2144**  
**Fax: 410.732.0303**

Account(s) carried by First Clearing. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.