



Pinnacle Investment's Commitment to Your Privacy

As you may know, Pinnacle Investments, LLC ("Pinnacle Investments") and First Clearing* have an agreement that First Clearing will provide trade execution, clearing and related activities for your account. In connection with these services, First Clearing is required to communicate its position as it pertains to the privacy of our customers' information. We are proud of our privacy and confidentiality practices, and we want you to know how we work with First Clearing to protect your information and to use your information to service your account. Please take a moment to review our privacy policy, as described below.

How and Why We Obtain Information

In order to facilitate the servicing of your account, Pinnacle Investments may receive nonpublic personal information about you from any of the following sources:

- From your applications or forms (examples include name, address, Social Security number, birth date, assets and income)
- From transactional activity in your account (examples include trading history and balances)

How We Protect Your Information

Within Pinnacle Investments and among our service providers, we restrict access to your information to those who require that access in order to provide products and services to you. We may share the personal information that we collect about our customers, prospects or former customers with:

- Affiliates, including affiliated service providers (for example, our data processing company and printing operations)
- Government agencies and law enforcement officials (for example, for tax reporting or under court order)
- Other organizations, as permitted by the laws that protect your privacy (such as for fraud prevention)

Privacy Online

Pinnacle Investments considers privacy, security and service to be just as critical in the online environment as in the rest of our operation. We therefore employ all of the safeguards described above, along with the following Internet-specific practices.

First Clearing, along with Pinnacle Investments, uses a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures.

When we conduct business online, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web sites. This information may be used, for example, to alert you to software compatibility issues; or it may be analyzed to improve our Web design and functionality.

This privacy policy is provided to Pinnacle Investment's customers in addition to the privacy policy provided to you by First Clearing.

*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.