

## **Privacy Statement**

The following privacy statement is issued by Certified Financial Group, Inc. ("CFG") and its affiliates: Certified Advisory Corp ("CAC"), Certified Benefits Corp ("CBC"), Certified Insurance Corp ("CIC") and TransAm Securities, Inc. ("TAS").

### **Certified Financial Group, Inc., et al Privacy Policy**

Certified Financial Group, Inc. ("CFG") recognizes that its customers have an expectation that CFG and its affiliates will maintain the confidentiality of customers' nonpublic personal information. As a result, CFG, et al has adopted this Privacy Policy concerning information that you provide and information that is obtained in servicing your account.

Information about you is collected for purposes of administering your account or accounts with us. We collect information about you for specific business purposes and not for resale or transfer to unaffiliated parties. The information we collect, the source of the information and the purpose it is used for are explained below. If you close your account or it becomes inactive, CFG will adhere to the privacy policies and practices described in this notice.

### **Information Collected**

Nonpublic personal information is collected and retained by CFG, et al for purposes of administering your account. It is not furnished to third parties for any purpose other than to administer the account. The information we collect can be summarized as follows:

**Account Establishment Information.** This information is furnished by you on forms creating your account with CFG and its affiliated companies. Examples are your name and address, Social Security number and beneficiary designations (if applicable).

**Account Transaction Information.** This includes information obtained from you and the various entities that comprise the assets in your account. It includes correspondence and phone contacts with us concerning the account, account assets and our services. If the account was transferred from another financial institution, it may contain records from that institution.

### **Nonpublic Information that is Disclosed**

All information in your account may be disclosed to any person or entity you have authorized pursuant to your account establishment documents. In addition, information may be disclosed to affiliated or nonaffiliated third parties to further your goals in establishing an account with CFG, et al. Categories of information that are disclosed are as follows:

**Identifying Information.** Examples of this information include your name, address and Social Security or tax identification number.

**Transaction Information.** Examples include your directives to purchase or sell an asset in your account and the receipt of income to the account or distributions from the account.

### **Parties To Whom We May Disclose Nonpublic Information**

CFG, et al may disclose both identification and transaction information to affiliated and nonaffiliated parties for the following reasons:

**Financial Services Providers.** Examples are brokers, transfer agents, mutual fund companies or other representatives of the seller or purchaser of the asset or a firm that provides valuations for securities.

**Nonfinancial Companies.** Examples are companies that mail reports and prospectuses to you, statement printers and tax form providers.

CFG, et al does not disclose nonpublic personal information about our clients to any party except as permitted by law.

### **How CFG, et al Protects the Confidentiality of Your Nonpublic Personal Information**

CFG and its affiliates value the trust you place in us. To maintain that trust, we have put into place safeguards to protect the privacy of your nonpublic personal information. We do not sell or trade your information with nonaffiliated companies. When information is provided to third party providers to service the account, safeguards are in place to make certain that the information is used only for the purpose it is provided.

Internally, CFG, et al maintains records on secured computers. Prospective employees are screened for criminal convictions and drug use. Once hired, employees are advised of CFG, et al privacy policies and of the confidential nature of the information they handle. Employees are limited to accessing only that customer information that is necessary to perform their job functions.

CFG, CAC, CBC, CIC and TAS each consider privacy a fundamental right of clients and take seriously the obligation to safeguard client information. We will adhere to the policies and practices above for both current and former customers.

For questions concerning this policy, please contact us by calling 407-869-9800 or writing to: Privacy Management, c/o Privacy Department, Certified Financial Group, Inc., 1111 Douglas Avenue, Altamonte Springs, FL 32714.