



## PRIVACY POLICY

<b>FACTS</b>	<b>PRIVACY POLICY - WHAT DOES CONCORDE INVESTMENT SERVICES, LLC (“CONCORDE”) DO WITH YOUR PERSONAL INFORMATION?</b>
<b>WHY?</b>	Concorde Investment Services, LLC and its affiliates are committed to safeguarding your confidential information. Except as described in this Notice and as may be required or permitted by law, Concorde does not share your Customer information with non-affiliated third parties. Please read this notice carefully to understand what we do.
<b>WHAT?</b>	<p>Concorde collects and develops personal information about you. The term “Customer Information” means any type of personally identifiable information provided by you or gathered about you that is not generally publicly known. The essential purpose for collecting Customer Information is to provide and support the financial products and services you obtain from Concorde. The categories of Customer Information collected by Concorde depends upon the scope of the engagement with your Concorde investment representative (hereinafter referred to as “Representative”) and are generally described below.</p> <p>As a financial institution, Concorde collects and develops Customer Information to provide financial products and services. Customer information Concorde collects includes:</p> <ul style="list-style-type: none"> <li>• Information we receive from you on applications or other forms and specifically including your name, address, Social Security number, income, income tax rate, net worth, financial objectives, risk tolerance and the names of beneficiaries.</li> <li>• Information we receive or obtain from other sources, including: <ul style="list-style-type: none"> <li>○ Information collected and developed by issuers of securities, insurance products or services you own, to issue, administer and process transactions relating to these products or services.</li> <li>○ For products involving the extension of credit, information about your creditworthiness and credit history that we may obtain from unaffiliated consumer reporting agencies.</li> <li>○ Information about your financial products and services transactions with Concorde.</li> </ul> </li> <li>• If you apply for insurance products through Concorde, we may collect health information that you provide to us.</li> </ul>
<b>HOW?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the following section, we list the reasons Concorde can share your customers’ personal information; the reasons Concorde chooses to share; and whether you can limit this sharing.
<b>DOES CONCORDE SHARE YOUR PERSONAL INFORMATION?</b>	
Yes. To administer, manage and service customer accounts, process transactions and provide related services for your accounts, it is necessary for us to provide access to Customer Information within Concorde and to certain non-affiliated companies. Concorde restricts access to Customer Information to our Representatives and employees who need the information to perform their job responsibilities. Concorde maintains agreements, as well as physical, electronic, and procedural security measures that comply with federal regulations to safeguard your Customer Information.	
<b>REASONS WE CAN SHARE YOUR PERSONAL INFORMATION</b>	
<p>We may share Customer Information we gather with:</p> <ul style="list-style-type: none"> <li>• Entities that perform services for use or function on our behalf (including check printing services, clearing broker/dealers, investment companies and insurance companies).</li> <li>• Third-party administrators and vendors for the purposes of providing current and future information on your account (such as transaction history, tax information and performance reporting).</li> <li>• Financial institutions with whom we have entered into a networking or joint marketing agreements to provide you with valuable financial products or services.</li> </ul>	

Securities offered through Concorde Investment Services, LLC (CIS), member FINRA/SIPC. Offering securities in all 50 states. Advisory services offered through Concorde Asset Management, LLC (CAM), an SEC registered investment adviser. Insurance products offered through Concorde Insurance Agency, Inc. (CIA).

Concorde recognizes the right of each customer to select a broker-dealer representative to provide brokerage and insurance products and services. Your Customer Information may be shared with your Representative and his/her new firm during the transfer of your Representative's securities registration to another firm. The information to be shared may include Confidential Information in the custody of your Representative as well as other information in our possession or in the possession of certain non-affiliated third parties who perform services for your account that we believe are necessary to transfer your account, including your address, telephone number, email address, account number and type, transaction history, tax reporting information and other information relating to your account.

Your Customer Information may also be shared with certain entities that are owned, controlled by or affiliated with your Representative. In addition, in the event your Representative (or his/her estate) agrees with an unaffiliated representative to sell all or some portion of his/her securities or insurance business, your confidential Customer Information may be shared with the acquiring representative and his/her firm.

To the extent you provide health information to Concorde for the purpose of making application for insurance products, such information will not be disclosed to non-affiliated companies for any purpose, except:

- To underwrite or administer your insurance policy or related claims;
- As required by law; or
- As authorized by you

**INFORMATION WE COLLECT AND HOW WE USE THE INFORMATION**

We may collect the following categories of personal information that may be covered by the CCPA and use it for the following purposes:

**Types of Personal Information:**

- Contact information and other personal identifiers, such as name, postal address, email address, phone number, unique personal identifier, account name, registration numbers, tax identification number, Social Security number, passport number, and other similar identifiers
- Commercial and financial information, such as records of personal property or financial accounts, products or services, other purchasing or consuming histories or tendencies, information on investments, investment objectives, risk tolerance, time horizon, assets, income, expenses, net worth, tax status, holdings, account balances, transaction history, investment experience
- Internet or electronic activity information and device and online identifiers, such as IP address, online identifier or device IDs, or other similar identifiers, information regarding interaction with a website or application, browsing history, calls and emails sent and received
- Professional or educational information, such as information about your employment and background
- Demographic and family information, such as date of birth, sex, marital status, such as whether a client is related to someone who is employed in the securities industry, information about related parties to an account, dependents, and beneficiaries, citizenship
- Audio and visual information, such as voicemail, or other telephone recordings (e.g., for our support lines)
- Professional, such as information about your employment or businesses
- Other information you make available to us, such as in an email or phone call
- Inferences drawn from personal information to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance

**Our Uses of Personal Information**

- Offering and providing products and services, including opening accounts, communicating with you, providing investment recommendations, making suitability determinations, marketing our products and services to you, and connecting you with other products and services
- Operating our business, including ensuring the security and sufficiency of our networks, systems, products, services, applications, facilities; improving our products and services; managing risk; and securing accounts, property, and resources
- Complying with applicable regulatory and legal requirements (for example, client identification program, and know your customer requirements); protecting our rights, property, and the safety of our employees or others; responding to lawful requests; and other legitimate business and

	commercial purposes (including in connection with a sale, merger or consolidation, or other transfer of assets)
<b>WHERE TO FIND MORE INFORMATION</b>	If you are a Concorde client, you will also receive our Privacy Notice, as required by federal law, which provides information about how we collect, share, and protect your personal information and provides information about opting out of such sharing. Please note that you may interact with a representative, other financial institutions, or other third parties (sometimes referred to as non-affiliates), and direct us to share information with such third parties as we provide products or services to you. Concorde may not control the data practices of such third parties, and we recommend you review any applicable third-party privacy policies for information about their data practices.
<b>FORMER CLIENTS</b>	
If you close an account with Concorde, we will continue to operate in accordance with the principles stated in this Notice.	
<b>CAN YOU LIMIT THIS SHARING?</b>	
Yes. You may prevent disclosure of your Customer Information by instructing Concorde not to provide your Customer Information in these instances by calling Concorde at 248-824-6710, by email at <a href="mailto:optout@concordeis.com">optout@concordeis.com</a> , or by writing us at: 19500 Victor Parkway, Suite 550, Livonia, Michigan 48152. You may prevent this disclosure now or at any later time. In addition, you may contact us to revoke, or withdraw, your instruction to not share your Customer Information.	
<b>KEEPING UP TO DATE WITH OUR PRIVACY NOTICE</b>	
We may make changes to this policy at any time and will inform you of changes, as required by law. To receive the most up-to-date Privacy Notice, you may call us at 248-824-6710 or write us at: 19500 Victor Parkway, Suite 550, Livonia, Michigan 48152.	
<b>REQUIREMENTS OF LAW</b>	
<b>FEDERAL</b>	In November 1999, Congress enacted the Gramm-Leach-Bliley Act ("GLBA"). GLBA requires financial institutions, including broker-dealers, investment advisers, and investment companies to adopt policies and procedures designed to protect the privacy of Customer Information. To the extent a financial institution discloses Customer Information to non-affiliated third parties other than as permitted or required by law, customers must be given the opportunity and means to "opt out" (or prevent) such disclosure.
<b>STATE</b>	<p><b><u>Opt-Out State</u></b> If you live in a state that permits you to opt out (or, prevent) disclosure of your Customer Information, and you do not wish for us to share your Customer Information with those entities owned, controlled by or affiliated with your Representative, or if your Representative should sell his/her securities business to an unaffiliated representative or transfer his/her securities registration to another firm, you have the right to opt out of such disclosure. If you wish to prevent sharing of your Customer Information, please call Concorde at 248-824-6710, by email at <a href="mailto:optout@concordeis.com">optout@concordeis.com</a>, or in writing at: 19500 Victor Parkway, Suite 550, Livonia, Michigan 48152.</p> <p><b><u>Opt-In State</u></b> If you live in a state which requires your affirmative consent to authorize the sharing of your Customer Information, the Representative's new firm, Concorde and/or your Representative will seek your written instruction as required under applicable state law to authorize disclosure of your confidential Customer Information before that data is shared.</p> <ul style="list-style-type: none"> <li>Your Customer Information may also be shared with certain entities that are owned, controlled by or affiliated with your Representative.</li> <li>In addition, in the event your Representative (or his/ her estate) agrees with an unaffiliated representative to sell all or some portion of his/her securities or insurance business, your confidential Customer Information may be shared with the acquiring representative and his/her firm.</li> <li>You may prevent disclosure of your Customer Information by instructing Concorde not to provide your Customer Information in these instances by calling Concorde at 248-824-6710, by email at <a href="mailto:optout@concordeis.com">optout@concordeis.com</a>, or by writing us at: 19500 Victor Parkway, Suite 550, Livonia, Michigan 48152. You may prevent this disclosure now or at any later time. In addition, you may contact us to revoke, or withdraw, your instruction to not share your Customer Information.</li> </ul>

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**INFORMATION NOTICE FOR CALIFORNIA RESIDENTS FOR CONCORDE INVESTMENT SERVICES, LLC. AND CONCORDE ASSET MANAGEMENT, LLC.**

**WHAT IS THIS NOTICE?**

The California legislature enacted the California Consumer Privacy Act of 2018 (“CCPA”)—a law that relates to personal information about California residents. This Notice is provided on behalf of Concorde Investment Services, LLC. And our affiliate, Concorde Asset Management, LLC. (collectively “Concorde”) to advise you of types of personal information that Concorde may collect about you that may be covered by the CCPA and the purposes for which we collect such information. We are providing this notice broadly to California residents as a courtesy and considering the CCPA’s requirements. However, only limited personal information Concorde collects is covered by the CCPA considering our business and the Act’s exceptions. For instance, information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (“GLBA”) and implementing regulations, and the California Financial Information Privacy Act, is exempted from nearly all provisions of the CCPA, including the rights of access, deletion, and opt out. As a general matter, those laws apply to nonpublic personal information about individuals who obtain financial products or services from us primarily for personal, family, or household purposes.