

# **WALTON SECURITIES, INC.**

## **PRIVACY POLICY**

Walton Securities, Inc. (the “Firm”) is a FINRA licensed and regulated, “wholesale” Broker Dealer. It considers the confidentiality, integrity and security of investors’ information and records essential to maintaining trust and superior service.

The Firm collects certain non-public information concerning investors and prospective investors which includes clients and prospective clients of third-party Soliciting Broker Dealers with whom the Firm does business (collectively for these purposes only such investors and such clients are referred to as “investors”). Such non-public information includes: (i) information provided on an application or subscription document which contains identifying information, such as name, address, tax identification numbers, existing investments and investment profiles, (ii) account numbers and balance information, (iii) investment orders and confirmations, and (iv) information the Firm may receive from other reporting agencies or Soliciting Broker Dealers.

To the extent the Firm collects or comes into the possession of certain non-public information about investors, we shall not disclose such information to any person or entity, other than: (i) among our employees, subsidiaries and affiliates, (ii) as is required to carry out the Firm’s business and services, (iii) to comply with regulations applicable to our business, or (iv) as compelled by law.

The Firm does not sell such information to any third party, nor does the Firm exchange such information with third parties for marketing purposes.

The Firm has implemented internal policies and procedures to protect the privacy of such information it collects. The Firm adheres to these internal policies and procedures both during and after termination of the relationship. The Firm will not disclose any information regarding former investors other than: (i) as required by law, (ii) as directed by the investor, or (iii) as otherwise set forth herein. The Firm will provide the opportunity, if a situation were to arise outside of items (i), (ii), or (iii), to allow an opt-out.