

## Privacy Policy

FACTS	WHAT DOES FIRST HEARTLAND® DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security Number</li> <li>• Investment Experience</li> <li>• Assets</li> <li>• Account Numbers</li> <li>• Income</li> <li>• Account Transactions</li> <li>• Contact Information</li> <li>• Account Balance</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons First Heartland® chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information:	Does First Heartland® Share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> Such as to process your transaction, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes –</b> To offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes –</b> Information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes –</b> Information about your creditworthiness	No	We don't share
<b>For non-affiliates to market to you –</b> Only if your financial advisor leaves First Heartland®, retires or sells his or her practice	Yes	Yes

<b>To limit our sharing</b>	<p>Call <b>800-444-7244</b> to speak with our compliance department or visit us online at <a href="http://firstheartland.com">firstheartland.com</a>.</p> <p><b>Please note:</b> If you are a <b>new</b> customer, we can begin sharing information 30 days from the date we sent this notice. When you are <b>no longer</b> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call 800-444-7244 to speak with our compliance department.

# Privacy Policy

Who we are	
<b>Who is providing this notice?</b>	This notice is being provided on behalf of First Heartland® Capital, Inc. and its affiliates: First Heartland® Consultants, Inc., First Heartland® Corporation, and Elite Partners, LLC (“First Heartland®”).
What we do	
<b>How does First Heartland® protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. First Heartland® trains its associates on the proper handling of personal information and requires companies that help provide services to you to protect the confidentiality of personal information they receive.
<b>How does First Heartland® collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Open an account</li> <li>• Direct us to buy securities</li> <li>• Give us your contact information</li> <li>• Seek advice about your investments</li> <li>• Enter into an investment advisory contract</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choice will apply to everyone on your account – unless you tell us otherwise.
Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Our affiliates include companies with a common First Heartland® name and financial companies such as Elite Partners, LLC.</li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Non-affiliates may include your financial advisor's company and investment advisor firm, your financial advisor's new broker-dealer, and investment advisor firm if your financial advisor chooses to leave First Heartland®, and other broker-dealers and investment advisor firms designated by your financial advisor if he or she leaves First Heartland®, retires, or sells his or her practice.</i></li> </ul>
<b>Joint Marketing</b>	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• <i>Our joint marketing partners include banks, credit unions, retirement plans, and other financial institution programs.</i></li> </ul>
Other important information	
<b>Information for California, North Dakota, and Vermont Customers</b>	
In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.	