



## PRIVACY POLICY

### **Privacy Notice**

We, at Folionet Financial LLC, recognize the importance of respecting the privacy of our customers. Your customer information is carefully managed within our company and we want you to know the steps we take to protect the privacy of the customer information we collect.

This policy covers Customer Information. Customer Information means information personally identifiable with a specific customer, or about a customer's current, or former relationship with our company. We are providing this policy to you in accordance with the Federal Financial Privacy Law, 15 U.S.C. 6801-6810.

### **Information Security**

The information we gather helps us identify who you are, assess your needs and provide excellent customer service. We do not sell your information to other companies for any reason.

Managing the security of customer information is one of our most important responsibilities. We value your trust and handle all information we gather that concerns you, very carefully. All of our associates who have access to your information are bound by a code of conduct that requires the confidential treatment of all customer information. These associates are individuals who need to know that information to provide products and services to you. Our associates are subject to disciplinary action, if they fail to follow this code. Additionally, we maintain procedural electronic and physical safeguards to protect customer information.

### **Information We Collect**

We collect and utilize various types of information, which allows us to service your account, and to better understand your needs. The Customer Information we collect and maintain typically consists of the following:

- Information we receive from you on applications, forms, and other information you provide to us in writing, by telephone, electronically, or by any other means. This information may include your name, address social security number, assets, income, debt, or any other information.
- Information about your transactions and account history, such as account balances, trading activity, payment history and parties to transactions.
- Information we receive from a consumer-reporting agency.

### **Information We Disclose**

We may share information we obtain about you with other affiliates such as your name, address, social security number, assets and income. Sharing this information can make it easier for you to do business with us. For example, if you have an account with one of our affiliates and want to open an account with



another affiliate, we may share information about you and your transactions. This could save you time in opening the new account by not having the need to provide the same information twice.

**Accuracy of Information**

We strive to keep your account information accurate and up to date. You can access your account information in a number of ways, through your account statements, by telephone with one of our Registered Representatives, or at our offices. If your account information is ever inaccurate, incomplete, or in need of updating, please contact us immediately at the telephone number on your account statement or trade confirmation, write to us, or stop in at our office and we will update your account information. If you have any questions, or feel that we have not handled your information properly, please contact us and we will provide an answer, or investigate your inquiry.

**Notifications**

We will provide you with a notice of our privacy policy annually, as long as you maintain an account with us. We reserve the right to make changes to this policy periodically. Our privacy policy will continue to apply to you, even if you are no longer a customer.

**Contact Folionet Financial LLC Regarding this Policy**

For your convenience, this information is available on our website. For additional information regarding any of the items of this privacy policy, please contact Folionet Financial LLC at:

**Folionet Financial LLC**

**Attn: Compliance**

**1221 Brickell Ave. 9th floor**

**Miami, FL 33131**



## **BCP DISCLOSURE STATEMENT**

Folionet Financial LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at (786) 294-0585, support@folionet.com, you should call our alternative number (305) 303-4279 or go to our website at <http://folionet.com/>. If you cannot access us through either of those means, you should contact our clearing firms, (1) INTL FCStone Inc. (561) 544-7614 <https://www.intlfcstone.com/> and/or (2) Apex Clearing Corporation (214) 765-1167 <https://www.apexclearing.com/> for instructions on how they may provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

**Our business continuity plan addresses:** data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firms, INTL FCStone Inc. and Apex Clearing, back up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firms that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a reasonable time period. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 to 48 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business promptly. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website <http://folionet.com/> or our customer emergency number, (305) 303-4279 how to contact us. If



the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at (786) 294-0585 or [info@folionet.com](mailto:info@folionet.com).