

FACTS: WHAT DOES JANNEY 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?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number, name, address, email address, income and assets • Payment and transaction history and account balances • Employment and credit information and risk tolerance
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 Janney Montgomery Scott LLC and/or Janney Trust Co LLC (collectively, "Janney") chooses to share; and whether you can limit this sharing. Please note Janney does not "sell" your personal information (we do not disclose personal information to a third party for monetary or other valuable consideration).

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES JANNEY SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders, regulatory requests and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes—to offer our products and services to you	YES	NO
For joint marketing with other financial companies	NO	We don't share
For our affiliates' everyday business purposes—information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes—information about your creditworthiness	NO	We don't share
For our affiliates to market to you	NO	We don't share
For non-affiliates to market to you	NO	We don't share

TO LIMIT OUR SHARING	<p>Call 800-JANNEYS and ask to speak with Janney's Privacy Officer, or email PrivacyOfficer@Janney.com.</p> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer 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> <p>This notice is available at http://www.janney.com/privacy-policy.</p>
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QUESTIONS	Call 800-JANNEYS and ask to speak with Janney's Privacy Officer, or email PrivacyOfficer@Janney.com .
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WHO WE ARE	<p>Janney Montgomery Scott LLC ("JMS") is a full-service regional securities broker/dealer, serving customers through a comprehensive network of branch offices primarily in the Eastern United States. JMS headquarters are located at 1717 Arch St, Philadelphia PA 19103.</p> <ul style="list-style-type: none"> • JMS offers clients a complete range of investment vehicles, from individual securities to mutual funds, insurance, money management and other financial service products. • JMS also provides investment banking services to corporations and institutional clients. <p>JMS holds the professional investment manager Janney Capital Management LLC as an affiliate organization.</p> <p>JMS also holds the New Hampshire trust company Janney Trust Company LLC as an affiliate organization. Janney Trust Company LLC, when serving in a fiduciary capacity, does not share information for affiliates' business purposes or with other financial companies for purposes of joint marketing.</p> <p>JMS is an independently operated subsidiary of The Penn Mutual Life Insurance Company along with Penn Mutual's other affiliates, Penn Mutual Asset Management LLC and Horner, Townsend and Kent, Inc.</p>
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WHAT WE DO

How does Janney protect my personal information?	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. Janney Associates are trained in the proper handling of nonpublic client information. For more information, please visit: https://www.janney.com/data-security .
How does Janney collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none">• Open an account or seek advice about your investments• Give us your income information or contact and employment information We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none">• Sharing for affiliates' everyday business purposes—information about your creditworthiness• Affiliates from using your information to market to you• Sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.

DEFINITIONS

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include the financial companies: Janney Capital Management; Janney Trust Company. <ul style="list-style-type: none">• Janney will only share transactional information as necessary with our affiliates.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. This may include credit bureaus, closing agents, card processors, mutual fund/annuity/insurance companies, and printers and vendors that may perform marketing services on our behalf. <ul style="list-style-type: none">• Janney does not share your information with non-affiliates to market to you.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none">• Janney does not have joint-marketing agreements with nonaffiliated third parties.

OTHER IMPORTANT INFORMATION

If your financial advisor's affiliation with JMS ends and they join another broker-dealer, your financial advisor may be permitted to have limited information in order to contact you to join their new firm. The information they may have is limited to your name, address, email address, phone number and account title.

CUSTOMER IDENTIFICATION PROGRAM

In accordance with the USA Patriot Act, Federal law requires all financial institutions to obtain, verify and record information that identifies each individual or entity opening an account. This includes all personal and commercial accounts, including trust, brokerage, insurance and investment management accounts.

What this means to our clients

When you open an account, you will be asked to provide your name, address, Social Security or Tax identification number, applicable date of birth, and other information that will allow Janney to identify you, and you will be asked to provide identifying documents to verify that information.

DO NOT CALL POLICY

This notice accounts for the Janney Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via phone numbers listed on the state or federal Do Not Call lists, unless the law permits. Consumers who ask not to receive telephone solicitations will be placed on the Janney Do Not Call list and will not be called in future solicitations. If you communicate with us by telephone, we may monitor or record the call.

INFORMATION FOR SPECIFIC LOCATIONS

Nevada: If you are a Nevada resident, You may be placed on our internal Do Not Call List by following the directions in the “**To Limit Our Sharing**” section. Nevada law requires that we also provide you with contact information for the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; Phone number: (702) 486-3132; e-mail: BCPINFO@ag.state.nv.us.

Vermont: If you are a Vermont Resident, we will not disclose information about your creditworthiness to our affiliates and will not disclose any of your information to non-affiliated third parties to market to you, unless we request your consent and you authorize us to make those disclosures, in accordance with Vermont law. Refer to the Janney Privacy Policy at <http://www.janney.com/privacy-policy> for more information.

California: If you are a California resident, we will limit sharing the information we collect about you within our company and affiliates in accordance with California law. For example, we may share information with your consent to service your accounts, or to provide entitled rewards or benefits, limited to the extent required by California law. Janney does not share personally identifiable information with third-party persons or entities unless authorized by the customer. Janney does not collect personally identifiable information about individual consumers unless those consumers choose to provide such information. Janney does not allow other parties to collect personally identifiable information about its online customers’ individual online activities over time or across different web sites. Refer to the Janney Privacy Policy at <http://www.janney.com/privacy-policy> for specific provisions of our Privacy Policy for California residents.

European Union: If you are a resident of the European Union (EU), Janney understands that our EU customers count on us to protect their valuable personal data that is processed by Janney. Refer to the Janney Privacy Policy at <http://www.janney.com/privacy-policy> for specific provisions of our Privacy Policy in light of the European Union’s General Data Protection Policy (GDPR). In addition to the information in this privacy notification regarding access to and disclosure of your data, our data management policies for privacy and information security address issues such as:

- (i) our collection of client data and how it is stored and processed
- (ii) data protections and who has access
- (iii) our ability to respond to client requests related to their data

For insurance customers in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR and VA.

We may give your Information (customer information obtained in an insurance transaction) to state insurance officials, law enforcement, group policyholders about claims experience, or auditors as the law allows or requires. We may provide your Information to insurance support companies that may retain it or send it to others as needed to service your account. We may share your medical information to learn if you qualify for coverage, process claims, or prevent fraud, or if you provide authorization.

To see your information, notify Janney Privacy Officer, 1717 Arch St, Philadelphia PA 19103 - Attn: Information Request. Please state your full name, address, the information you are requesting, and insurance company and policy number (if relevant). We will inform you of the related information we have. If you think any Information is incorrect, you may submit a written request to have the Information corrected. We will notify you of what actions are taken. If you do not agree with our actions, you may send us a notice.

Janney may change this privacy notice at any time, and any changes or updates will be effective immediately on the date of posting. For a current version, please visit <http://www.janney.com/privacy-policy>.

You can also email PrivacyOfficer@Janney.com or call 800-JANNEYS and ask to speak with Janney’s Privacy Officer.

