

# NOTICE OF PRIVACY POLICY

Protecting your privacy is very important to us at Winslow, Evans & Crocker, Inc. We want you to understand what information we collect and how we use it.

## FACTS

### WHAT DOES WINSLOW, EVANS & CROCKER, INC. & WINSLOW, EVANS & CROCKER INSURANCE AGENCY, INC. DO WITH YOUR PERSONAL INFORMATION?

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#### 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.

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#### What?

The type of personal information we collect and share can include: (i) Social Security number; (ii) date of birth; (iii) income; (iv) assets; (v) account balances; (vi) payment history; (vii) any other information that we receive from you on applications or other forms; (viii) information about your transactions with us, our affiliates, or others; (ix) information obtained through discussions with our sales, operations and customer service staff; (x) insurance scores; (xi) information received through our contact form on our website or direct E-mails; and (xii) information we receive from other sources, including consumer-reporting agencies, with your consent or with the consent of your representative

When you are no longer our customer, we continue to share your information as described in this notice.

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#### 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 Winslow, Evans & Crocker, Inc. chooses to share and whether you can limit this sharing.

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#### Is it protected?

We internally safeguard your non-public personal information by restricting access to only those employees who provide products or services to you or those who need access to your information to service your account. In addition, we maintain physical, electronic and procedural safeguards that meet federal and/or state standards to guard your non-public personal information.

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Reasons we can share your personal information	Does Winslow, Evans & Crocker, Inc. and Winslow, Evans & Crocker insurance Agency, Inc. share?	Can you limit this sharing?
<p><b>For our everyday business purposes</b> - solely to process your transactions, open, maintain and service your account(s) respond to court orders and legal investigations, or meet requirements of existing Laws, Rules and Regulations (including but not limited to Federal, State, U.S. Securities and Exchange Commission (SEC), Financial Regulatory Authority (FINRA), respond to regulatory inquiries of the above-listed and other regulatory organizations, or report to credit bureaus or insurance credit bureaus such as Equifax, Inc. or similar.</p> <p>We also share your information with Pershing, LLC and Raymond James &amp; Associates – our Clearing Firms, Mutual Fund Companies that you are investing in, insurance companies that you are insured through or applying for coverage with. In addition, we share your information with the following qualified custodians: Fidelity and TD Ameritrade if you maintain an account with them. In addition, we share your information with other qualified custodians in cases when you designate such custodian for your account.</p> <p>Charles Schwab &amp; Co., Inc. (“Schwab”) – Schwab is providing trading, clearing and custody services to customers of Winslow Wealth Management. If you do not maintain relationship with Winslow Wealth Management your information will not be shared with Schwab</p> <p><b>For the purposes of your protection and “Know your customer” rule</b> - Occasionally, we receive mail returns from the United States postal Service. Upon receipt, we will attempt to contact you via a telephone call, fax or an established shipping carrier (i.e. Federal Express, DHL, etc.). Should we be unsuccessful in our attempts to contact you we will attempt to locate you utilizing the confidential services of Equifax, Inc. In those cases we will disclose your nonpublic personal information to Equifax, Inc.</p> <p><b>When registered representatives change firms</b> - in January 2009 the Firm joined the recruitment protocol pact that addresses the migration of basic customer information from one Broker Dealer firm to another when a registered representative is changing firms. The term “Basic Information” includes the customer’s Name, Street Address, telephone numbers and e-mail addresses. In accordance with the pact, we will release your basic information to the new representative’s broker dealer firm.</p>	<p><b>YES</b></p> <p><b>YES</b></p> <p><b>YES</b></p> <p><b>YES</b></p>	<p><b>NO</b></p> <p><b>NO</b></p> <p><b>NO</b></p> <p><b>YES</b></p>
<p><b>For our marketing purposes</b> - to offer our products and services to you</p>	<p><b>NO</b></p>	<p><b>N/A</b></p>

<b>For joint marketing with other financial companies</b>	<b>NO</b>	<b>N/A</b>
<p><b>For our affiliates' everyday business purposes - information about your transactions and experience.</b></p>	<p>Affiliated companies Winslow, Evans &amp; Crocker, Inc. and Winslow, Evans &amp; Crocker Insurance Agency, Inc., Winslow Wealth Management, LLC and Winslow Fiduciary Services, LLC are operating utilizing identical technology, vendors and staff. In addition: Each of the above-mentioned entities is owned by National Holdings Corporation (NHLD), a publically traded Company. NHLD also owns National Securities Corporation, National Asset Management, Inc. National Tax and Financial Service, and National Insurance Corporation. While affiliated companies do not share Customer base, they can rely on similar or identical technology, vendors and staff, thus, your information is being shared with all or some of affiliates listed above.</p>	<p><b>NO</b></p>
<p><b>For our affiliates' everyday business purposes - information about your creditworthiness.</b></p>	<p>Affiliated companies Winslow, Evans &amp; Crocker, Inc. and Winslow, Evans &amp; Crocker Insurance Agency, Inc., Winslow Wealth Management, LLC and Winslow Fiduciary Services, LLC are operating utilizing identical technology, vendors and staff. In addition: Each of the above-mentioned entities is owned by National Holdings Corporation (NHLD), a publically traded Company. NHLD also owns National Securities Corporation, National Asset Management, Inc. National Tax and Financial Service, and National Insurance Corporation. While affiliated companies do not share Customer base, they can rely on similar or identical technology, vendors and staff, thus, your information is</p>	<p><b>NO</b></p>

	being shared with all or some of affiliates listed above.	
	Affiliated companies Winslow, Evans & Crocker, Inc. and Winslow, Evans & Crocker Insurance Agency, Inc., Winslow Wealth Management, LLC and Winslow Fiduciary Services, LLC are operating utilizing identical technology, vendors and staff. In addition: Each of the above-mentioned entities is owned by National Holdings Corporation (NHL), a publically traded Company. NHL also owns National Securities Corporation, National Asset Management, Inc. National Tax and Financial Service, and National Insurance Corporation. While affiliated companies do not share Customer base, they can rely on similar or identical technology, vendors and staff, thus, your information is being shared with all or some of affiliates listed above.	YES
<b>For our affiliates to market to you</b>		
<b>For our affiliates to market to you</b>		
<b>Charles Schwab &amp; Co., Inc. (“Schwab”)</b> – Schwab is providing trading, clearing and custody services to customers of Winslow Wealth Management. If you do not maintain relationship with Winslow Wealth Management your information will not be shared with Schwab	YES	YES
<b>For non-affiliates:</b>		
<b>Chicago Clearing Corporation (“CCC”)</b> – In May 2010 Winslow, Evans & Crocker, Inc. engaged CCC to provide class action litigation monitoring and securities claim filing services in order to assist our clients with the proliferation of securities class action litigations and filing process as well as to maximize potential recovery of such claims for our clients	YES	YES
<b>Advent: Advent Portfolio Exchange-</b> Winslow, Evans & Crocker, Inc engaged Advent to provide portfolio and	YES	YES

<p>performance reporting. Advent receives a daily holdings data feed.</p> <p><b>Thomson Reuters: Baseline &amp; Eikon</b> - Winslow, Evans &amp; Crocker, Inc engaged Thomson Reuters and Baseline to provide in depth security evaluation, portfolio analytics and research reporting. Baseline receives a daily holdings data feed from Pershing.</p> <p><b>Orion:</b> Winslow, Evans &amp; Crocker, Inc engaged Orion to provide compliance, portfolio and performance reporting. Orion receives a daily feed from Pershing, Fidelity, TD Ameritrade and Raymond James &amp; Associates of account information and holdings data.</p> <p><b>Sawtooth:</b> Winslow, Evans &amp; Crocker, Inc engaged Sawtooth to provide sub advisory services for certain accounts custodied at TD Ameritrade. Sawtooth has access to the accounts at TD Ameritrade and has access to a daily feed from TD Ameritrade of account information and holdings data.</p>	<p><b>YES</b></p> <p><b>YES</b></p>	<p><b>YES</b></p> <p><b>YES</b></p>
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<p>Questions?</p>	<p>Call (617) 896-3548 or go to <a href="http://www.winslowevanscrocker.com">www.winslowevanscrocker.com</a></p>
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## SEC Rule 606 Order Disclosure (Formerly SEC Rule 11Ac1-6)

The U.S. Securities and Exchange Commission's client disclosure rule, SEC Rule 606, requires all broker/dealers that route orders in equity and option securities to make available quarterly reports that present a general overview of their routing practices. The reports must identify the significant venues to which the client orders were routed for execution during the applicable quarter and disclose the material aspects of the broker/dealer's relationship with such venues. Please visit [www.winslowevanscrocker.com](http://www.winslowevanscrocker.com) for the latest order routing quarterly reports.

As with any large body of statistical information, the data needs interpretation and context. For example, time to execution is calculated on the basis of time from order entry to the time the order is filled; it does not consider the amount of time required to enter the order on the trading platform interface. In a situation where a large number of orders are received simultaneously, this can have a significant impact.

Although the firm does not receive direct payments for order flow, Winslow does receive a reduction in execution expenses for certain order routing. In addition, the firm may receive liquidity credits for some of its equity trading activity. The credits are considered payment for order flow even though it may not necessarily offset Winslow's aggregate payments for removing liquidity. In this regard, in any given month, the "credits" received by Winslow from a given market center may exceed the "debits" charged to Winslow for such period. Therefore, such excess credits paid to Winslow may constitute, according to regulatory interpretation, payment for order flow. The Firm also incurs additional execution expense for other order routing decisions. The Firm's only consideration in determining the execution venue for any individual order is to obtain the best execution for the customer, based on all the information available to the firm, at the time the order is received. Certain Regional Exchanges may execute more than 5% of our order flow. This is the result of further routing by an executing firm, not a result of direct routing by Winslow.

WINSLOW, EVANS & CROCKER, INC.

GRIEVANCES AND COMPLAINTS FILING INFORMATION

In the unfortunate event that you should have a complaint with respect to our operations, inclusive of actions of our staff, we advise you to direct them to the attention of Leonid Berline, Executive Vice President, Chief Compliance Officer.

Mr. Berline can be reached at (617) 896-3548

Should you decide to send your written complaint you can do so by using the following contact information:

Winslow, Evans & Crocker, Inc.  
Attn: Leonid Berline  
Executive Vice President  
Chief Compliance Officer  
175 Federal St., 6<sup>th</sup> Floor,  
Boston, MA 02110

SEC and MSRB REGISTRATION STATEMENT

Winslow, Evans & Crocker, Inc. is registered with SEC and the MSRB.

SEC Website is [www.sec.gov](http://www.sec.gov)

MSRB website is [www.msrb.org](http://www.msrb.org)

MSRB investor's brochure is posted on MSRB's website and describes protections that may be provided under MSRB rules and how to file a complaint with the appropriate regulatory authority.