

*DISCLOSURE NOTICES TO KEEP FOR YOUR RECORDS*

## Privacy Policy

At Thurston Springer, protecting your privacy is very important to us. We value your trust and want you to understand what information we collect, how we use it, and how we protect it. The Gramm-Leach-Bliley Act, passed in November 1999, requires that all companies distributing financial and insurance products to the public develop and publish a privacy policy. Thurston, Springer, Miller, Herd & Titak, Inc.'s Privacy Policy provides information relating to how and when we share customer information with unaffiliated third parties. A copy of our privacy policy is delivered to clients at the time of account opening – either hand-delivered or by mail, and annually thereafter – by mail, to the last known address.

- **Personal Information We May Collect**

During our relationship, Thurston Springer may obtain nonpublic personal information from you. The information we obtain assists the firm and our Financial Advisors in providing you with products and services, and also to satisfy regulatory requirements. This information may be obtained from various sources including:

- Account applications and other forms,
- Your transactions with us or others,
- From written, electronic and verbal correspondence and communication,
- From a consumer reporting agency.

- **The Balance of Respecting Your Privacy & Sharing Information with Third Parties**

As a matter of policy, Thurston Springer does not disclose personal or account information provided by clients to non-affiliated third parties, except as follows:

- When required or permitted by law, or as necessary for third parties to perform their agreements with respect to services performed on our behalf.

Thurston Springer reserves the right to:

- In limited circumstances, disclose or report personal information to non-affiliated third parties when the firm believes in good faith that disclosure is required under law, and to cooperate with regulators or law enforcement authorities as may be requested.
- Disclose information about client accounts to a non-affiliated third party at the client's request, or with the consent of the client.
- Disclose personal information that is necessary in providing administrative, custodial, or customer assistance, and in preparing, printing, and delivering statements and other client related documents. These companies include clearing firms, mutual fund, annuity, and other financial services companies that aid in fulfilling these services to our clients.
- Thurston Springer does not provide information about our clients or former clients to any non-affiliated third party for marketing purposes.

- **Opt Out Provision**

If your Financial Advisor leaves Thurston Springer to join another broker-dealer that is a member of the Protocol for Broker Recruiting (to which our firm is a signatory), we may permit your advisor to retain certain contact information that may be used by his/her new firm; limited to your name, address, email address, phone number, account title and account type. If you object to such information being retained by your Financial Advisor or shared with his/her new firm, you may opt out by contacting our Compliance Department at (800) 433-8049 or emailing [Compliance@ThurstonSpringer.com](mailto:Compliance@ThurstonSpringer.com).

- **Procedures to Safeguard Private Information**

Thurston Springer maintains procedures and technology designed to prevent unauthorized access to private personal information. We restrict access to personal information to employees and service providers who need to know that information to provide products or services to you. Employees who violate our Privacy Policy are subject to company and regulatory disciplinary action.

When accessing your account via a link from [www.ThurstonSpringer.com](http://www.ThurstonSpringer.com) using a browser, such as Google Chrome or Microsoft Edge, it is encrypted using https Secure Socket Layer (SSL) 128-bit encrypted security. This technology is used to protect the confidentiality of your personal information.

- **Change in Privacy Policy**

Thurston Springer reserves the right to modify or supplement this Privacy Policy at any time. If a material change is made, we will provide current clients with a revised notice that describes our new policy and if such practices so require, we will give them a reasonable opportunity to opt out of the disclosure of information under the revised Privacy Policy.

## Business Continuity Plan

Thurston Springer is committed to providing reliable, trustworthy service that represents the best interests of our clients. The firm has developed a Business Continuity Plan to protect clients and employees in the event of an emergency or significant business disruption. Since the timing and impact of disasters and disruptions are unpredictable, we anticipate needing to be flexible in responding to actual events as they occur.

The Plan is designed to protect client assets and help prepare for securing employees' safety and firm property, making financial and operational assessments, promptly recovering and resuming operations, protecting the firm's books and records, and allowing our clients to transact business and to access their funds and securities. 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.

The Business Continuity Plan considers various scenarios that range in severity - from just our office to the entire building, to our local area, to a regional level. In the event Thurston Springer's office location is inaccessible, alternative locations have been established and prepared to facilitate business operations. The firm has redundancies in place for its business-critical systems and our phone system has a forwarding feature when it is not working. Depending on the severity of the issue, we believe that we can resume most business functions within the same day as the disruption. Our goal in all situations is to return to normal business conditions as soon as possible, with minimal impact to our clients and employees. In an extreme situation where continuing business may not be possible or practical, Thurston Springer ensures clients the ability to transact business and to access to their funds and securities.

- **Corporate Headquarters Location and Telephone Numbers**

Thurston, Springer, Miller, Herd & Titak  
9000 Keystone Crossing, Suite 740  
Indianapolis, IN 46240

Local (317) 581-4000

Toll Free (800) 433-8049

Fax (317) 581-4014

Website [www.ThurstonSpringer.com](http://www.ThurstonSpringer.com)

- **Custody of Assets**

Our clearing firm backs 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 firm that should it experience a significant business disruption, its objective is to provide the best possible recovery to our firm and clients.

Clients with accounts held directly at a mutual fund, annuity, life insurance or other financial services company will have the ability to call those respective companies directly if needed.

- **Limited Ability**

Thurston Springer does not guarantee that for every disaster or business disruption, such plans will be successfully implemented or that such plans will be sufficient and appropriate to avoid, deter or mitigate the disaster or business disruption.

If you have questions about our Business Continuity Plan, contact Compliance at (317) 581-4000 or (800) 433-8049.

- **Change in Policy and Updates**

Thurston Springer's Business Continuity Plan is subject to change at any time without notice. Updated plans will be promptly posted on our website: [www.ThurstonSpringer.com](http://www.ThurstonSpringer.com).

## Customer Identification Program

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.

This Notice answers some questions about this broker/dealer's Customer Identification Program.

- **What types of information are required to be provided?**

At the time you open an account with us, we are required to collect information such as the following from you:

- Your name
- Your date of birth
- Your address
- An identification number
  - U.S. Citizen: taxpayer identification number (Social Security number or employer identification card)
  - Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification number

You may also need to show your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employee identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, FINRA, and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience, and objectives, and risk tolerance.

- **What happens if I don't provide the information requested, or my identity cannot be verified?**

Thurston Springer may not be able to open an account or carry out transactions for you. If we have already opened an account for you, we may have to close it.

We thank you for your patience and cooperation, and hope that you will support the financial services industry's efforts to deny terrorists and money launderers access to America's Financial System.

## Member FINRA and SIPC

Thurston, Springer, Miller, Herd & Titak, Inc. is a member of

- **FINRA** - Financial Industry Regulatory Authority  
1735 K. Street NW, Washington, DC 20006-1516  
[www.Finra.org](http://www.Finra.org)

- **SIPC** - Securities Investor Protection Corporation

An explanatory brochure of the protection afforded to investors by SIPC is available upon request at: [www.SIPC.org](http://www.SIPC.org) (202) 371-8300.

# Statement of Interest Charges

## Accounts on which Interest is Charged • Calculation of Interest • Lien and Collateral

To assist you in managing your borrowing needs and to familiarize you with the terms under which credit is extended on your account, we have developed this Statement of Interest Charges. Please review this Statement of Interest Charges prior to utilizing credit.

### Accounts on which Interest is Charged

Interest may be charged on margin credit extended for the purpose of purchasing, carrying or trading in securities. Interest charges are calculated on a settlement date basis and details supporting such calculation will be displayed on your monthly statement.

Payments for purchases in cash accounts should be received on or before the settlement date shown on the trade confirmation. If your payment is received after that date, an interest charge may be posted to your cash account.

Proceeds from a sale in a cash account are not required to be disbursed prior to the settlement date shown on the trade confirmation. Occasionally, we may honor a request to disburse sale proceeds prior to settlement date. If this privilege is utilized, an interest charge may be posted to your account.

### Calculation of Interest

Your annual rate of interest will vary depending on the size of your daily adjusted debit balance. The daily adjusted debit balance is the net total of the settled balances in your account.

Short positions are “marked-to-market” daily. Since the security sold short must be borrowed in order to deliver it to the buying broker, the credit that results from the sale is not available to you. The market value of the short sale is debited against your margin balance to arrive at a daily adjusted debit balance for interest purposes. The daily closing price is used to determine any appreciation or depreciation of a security sold short, which will adjust your daily adjusted debit balance.

You may be charged additional fees in connection with establishing and maintaining a short position and such charges may be disclosed to you at the time a short position is established or may be imposed or increased from time to time in light of changing market conditions. When a security that you have sold short is no longer easy-to-borrow, we may make an immediate change to any fees that may be paid by you or assessed to your account to reflect current rates relating to the borrow.

*The annual rate of interest applicable to your account will be computed using a selected rate above the Wall Street Journal (WSJ) Prime Rate. Your annual rate of interest may change, without prior notice to you, in accordance with changes to the WSJ Prime Rate. If the interest rate charged to you is individually negotiated (a "Negotiated Rate"), such Negotiated Rate will be a percentage at, above or below the WSJ Prime Rate. Your Negotiated Rate will change consistent with changes to the WSJ Prime Rate without prior notice to you. We may terminate your Negotiated Rate without prior notice to you and you will be charged an interest rate above your Negotiated Rate but not more than our table of interest rates.*

*For the current WSJ Prime Rate, please visit: [www.wsj.com/market-data/bonds/moneyrates](http://www.wsj.com/market-data/bonds/moneyrates) or contact your Financial Professional.*

The table of interest rates is as follows:

Margin Debit Balance	Rate of Interest
\$0 to \$24,999.99	WSJ Prime + 5.875%
\$25,000 to \$49,999.99	WSJ Prime + 4.750%
\$50,000 to \$99,999.99	WSJ Prime + 4.625%
\$100,000 to \$249,999.99	WSJ Prime + 3.000%
\$250,000 to \$499,999.99	WSJ Prime + 2.875%
\$500,000 to \$999,999.99	WSJ Prime + 2.750%
\$1,000,000 to \$4,999,999.99	WSJ Prime + 2.250%
\$5,000,000 to \$9,999,999.99	WSJ Prime + 1.750%
\$10,000,000 and above	WSJ Prime + 1.500%

Interest is computed daily on the basis of a 360-day year using the following formula:

$$\frac{\text{Adjusted Debit Balance}}{1} \times \frac{\text{Interest Rate}}{100} \times \frac{\text{Number of Days}}{360}$$

### Lien and Collateral

Clearing Firm will maintain a first priority perfected security interest in the securities or other property (the “Securities Collateral”) in your account when credit is extended to you. You agree to promptly satisfy all margin and maintenance calls. Should your account fall below margin maintenance requirements, Clearing Firm may liquidate the Securities Collateral in your account, or any other account you may have an interest in held at Clearing Firm, without notice to you.

Account(s) carried by First Clearing. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.

## Schedule of Client Fees

Annual Fee by Account Type	Amount
Investment Account Inactivity Fee (Standard Brokerage/ Advantage Basic)	\$40
Custodial (UGMA/UTMA Account Activity Fee	\$30
Advantage Account – Check Writing W/ Debit Card	\$125
Advantage Basic Account – Check Writing W/O Debit Card	No additional charge
First Clearing Custodian IRA	
• Annual Maintenance	\$50
• Termination Fee	\$95
Transaction Service Fees	Amount
Postage and Handling – Trade Confirmation	\$3.86
Account Transfer to Another Firm (ACAT)	\$95
Domestic Wire Transfers	\$25
International Wire Transfers	\$25
Return of Deposited Checks	\$10
Insufficient Funds (Advantage Checks drawn on account)	\$20
Stop Payment of Client issued checks Advantage	\$25
Other Fees	
Physical Certificates (shares re-registered and mailed to client)	1. Standard Delivery (pass through DTC charges) 2. Rush Delivery (pass through DTC & transfer agent fees) 3. Re-registration of physical cert (\$125 per item) 4. GNMA certificate issuance (\$35 per item)
Rejection of ineligible physical certificates presented for deposit	\$50
Direct Registration Reject Fee	\$75
Replacement of Securities Lost by Customer	\$100 plus transfer bonding
Safekeeping Charge	1. Initial presentment fee (\$500) 2. Annual fee (\$150 per position)
Direct Participation Program	\$100 annually
Reorganization Activity	1. No fee for non-physicals 2. Instructions received after expiration (\$100 per item)
Overnight Express Mail	\$15
Prepayment Fees – Trades	Margin interest rate
Qualified Retirement Plans	Pass through

With any of the client services items listed above, there may be certain instances where additional fees apply and will be charged and priced based on the situation. Fees that are directly passed on from vendors are subject to change without notice.