



INVEST FINANCIAL CORPORATION PRIVACY POLICY

Preserving trust is a core value. We recognize that you expect us to adopt policies and procedures reasonably designed to protect the information you provide us and to use it responsibly. We are committed to fulfilling the trust that is the foundation of your expectations. For that reason, we have adopted and adhere to the following policy regarding the privacy of your nonpublic personal information and personally identifiable information (collectively "Nonpublic Personal Information").

INFORMATION THAT WE COLLECT

We may collect Nonpublic Personal Information from you or others, including your name, address, email address, telephone numbers, Social Security Number, other information that permits us to contact or communicate with you, information about your financial situation, including your employment or occupation, salary, assets, insurance and investment transactions, banking information, and other financial and tax information you may elect to supply to us. For certain insurance products, we may collect health information that you provide to us.

HOW WE COLLECT INFORMATION

We collect this Nonpublic Personal Information through various sources, including information from:

- You on new account forms, fact-finding questionnaires, product and service applications, and other forms;
- You, in writing, electronically, through the telephone, or through our website, when you communicate with us or request information about our products and services;
- · Consumer reporting agencies;
- Affiliated and unaffiliated product sponsors with whom we have selling relationships and whose products you have applied for, own or have previously owned; and
- Other individuals or entities that you may authorize us to obtain information from, such as your attorney or accountant.

INFORMATION THAT WE DISCLOSE

As permitted by law and as outlined in this policy, we disclose Nonpublic Personal Information to affiliates and unaffiliated third parties that provide services to us or with whom we have contractual relationships in order that we may effectively and efficiently carry out your directions and service your account. Examples of third parties with whom we may share your Nonpublic Personal Information include:

- Mutual fund companies, insurance companies, and other product sponsors in order to generate proposals, reflect available services, quote insurance, execute your investment and insurance transactions, and otherwise service your accounts;
- Clearing Agencies or other broker/dealers through whom we clear and settle your securities transactions;
- Companies providing account performance and/or reporting services on your accounts;
- Third party asset managers with whom we have relationships for the management of customer accounts;
- Banks and other financial institutions where our Representatives are located and with whom we have arrangements for the marketing and sale of our products and services:
- Companies that provide services to us to assist with the maintenance of required books and records or to facilitate client mailings or publications on our behalf;
- State, Federal, and other regulatory and self-regulatory authorities, or under a subpoena for release of information, as required by law or regulation;
- Other companies, associations, agencies, third parties, and institutions that provide services to us in order that we may more effectively and efficiently service your account;
- Those companies, associations, agencies, third parties, and institutions with which we or our Representatives are licensees, registrants, or Members; and
- In certain situations, your Representative when leaving our Firm for another firm, as is outlined below.

Where we share your Nonpublic Personal Information with third parties for the purposes noted above, we ensure that there are contractual agreements with the third party prohibiting their use and disclosure of that information for any purpose other than to carry out the purposes for which you disclosed the information, or that such third party is prohibited by law from further sharing your information. Except under the circumstances outlined above, we will not share Nonpublic Personal Information with affiliated or unaffiliated third parties concerning our current or former customers for marketing purposes or otherwise.

MADV6130A IFC 09/11 Page 1 of 2

OUR REPRESENTATIVES

We recognize that our clients have elected to open accounts with us due to the efforts of our Representatives. Because of the importance of your relationship with your Representative, if he or she elects to leave our Firm for another firm, insurance agency or investment adviser, we may allow them to take your information to the new firm, subject to the requirements or limitations of applicable law.

Certain states have privacy laws that require that you "opt-in" to your Representative sharing your information with their new firm. In those states we will obtain your consent before allowing your Representative to take your information with him or her should your Representative leave our Firm.

Other states are "opt-out" states, that require that you notify us if you do not want your Representative to share your information with his or her new firm.

If you do not want your Representative to transfer this information in the event he or she decides to leave our Firm for another registered broker/dealer, please contact us at 1-800-242-4732, option 1 (for investors), then option 2 (for our Customer Service Department) to opt out of this information sharing.

STEPS WE TAKE TO PROTECT YOUR INFORMATION

We have security policies and procedures reasonably designed to prevent unauthorized use or access to your Nonpublic Personal Information. In addition to your Representative and his or her office, your information is available to employees for various business purposes, such as processing or servicing transactions, and those fulfilling compliance, legal or audit functions. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of your Nonpublic Personal Information in accordance with state and federal privacy regulations.

AMENDMENTS TO OUR PRIVACY POLICY

When we make material amendments to our Privacy Policy we will post an appropriate notice on our website. In addition, we may send you an amended version of our Privacy Policy through the mail (or email if you have properly consented us to do so).

MADV6130A IFC 09/11 Page 2 of 2