



Privacy Policy

Robbins Securities Inc. provides investment brokerage services by means of its own internal operation and those of its clearing and execution firms and other unaffiliated third party providers, such as mutual funds and variable product sponsors. Robbins Securities Inc. executes transactions through another broker, which in turn acts as an introducing broker to the clearing firm, and the clearing firm processes the transactions and acts as the account custodian. All of the above-listed unaffiliated parties receive and maintain information about you that is related to and necessary for processing investments in your account.

WHERE DO WE OBTAIN THE INFORMATION? The information that we have comes directly from you. This includes such information as your name, address and Social Security number that you provided on applications, agreements or other forms. In addition, we maintain records of each of your transactions and holdings processed by us. We also may obtain information about you, such as your credit history or other facts relating to creditworthiness, from a consumer-reporting agency.

TO WHOM DO WE DISCLOSE THE INFORMATION? We provide information about current or former clients from the sources described above to entities affiliated with Robbins Securities, Inc. and to parties outside of this firm. Outside parties receive information only as described below:

To other companies as necessary to process your business. For example, we process your mutual fund and variable product transactions through product providers with whom we have dealer-selling agreements. If you have a trading account, the information that we obtained from you is given to the clearing firm for purposes of facilitating securities trading and statement preparation. These parties must limit their use of the information to the purpose for which it was provided.

Where required by law or regulation. Examples include responses to a subpoena, court order or regulatory demand.

As authorized by you. You may direct us, for example, to send account statements or other account information to a third party.

As otherwise authorized or permitted by law. For example, the law permits us to respond to a request for information about you from a consumer-reporting agency.

CONFIDENTIALITY AND SECURITY: We restrict access to information about you to those employees and authorized agents who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards to maintain the confidentiality of your information. To request that the release of your non-public information be limited to firms involved in processing your orders, call 773-714-9000 or email info@robbinstrading.com.

December 2009



Nonpublic Financial Information Policies

Policy to Safeguard Customer Records and Information

Our procedures are reasonably designed to:

1. Insure the security and confidentiality of customer records and information;
2. Protect against any anticipated threats or hazards to the security or integrity of customer records and information; and
3. Protect against unauthorized access to or use of customer records or information that could result in substantial harm or inconvenience to any customer.

Administrative Safeguards

We restrict access to nonpublic personal information about customers to those employees who need to know that information to provide products or services to customers or as is otherwise permitted or required by law.

Technical Safeguards

We electronically maintain and/or transmit to affiliated entities or service providers nonpublic personal information on or over what are represented to us as, and what we believe to be, secure protocols. Access to this information is restricted to individuals who need to know that information to provide products or services customers expect to receive from us or as is otherwise permitted or required by law.

Physical Safeguards

We maintain both electronic storage media and physical documents containing customer nonpublic personal information by means that we believe are secure and private. We transmit such information to affiliated entities or service providers (a) electronically, by means which we believe are secure, and (b) physically, by the United States Postal Service or independent overnight courier.

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