

Privacy Policy

Your relationship with Zinvest Financial Service ("ZFS") is based on trust, confidence and high standards of professional conduct.

To fulfill its responsibilities to you, ZFS requires that you provide current and accurate financial information, including updating the information on file with ZFS as material changes occur. You deserve to expect that ZFS will protect the information you have provided in a manner that is safe, secure and professional. ZFS and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked and stored in a secure manner. No individual who is not so authorized shall obtain confidential customer information. No individual with authorization to access confidential and financial customer information is permitted to share that information in any manner without the specific consent of a firm principal. Any individual's failure to observe ZFS procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Nonpublic information is collected using new account applications, client profiles and any updates thereto.

Sharing Nonpublic Confidential and Financial Nonpublic Information

You hereby authorize your wireless operator (AT&T, Sprint, T-Mobile, US Cellular, Verizon or any other branded wireless operator) to use your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber status details, if available, to allow verification of your identity and to compare information you have provided to ZFS with your wireless operator account profile information for the duration of the business relationship.

ZFS will not share such information with any nonaffiliated third party except:

- When necessary to complete a transaction in the account
- When required to maintain or service the account
- To resolve customer disputes
- When requested by an authorized party on the account
- As authorized in writing by client to attorneys or accountants,
- When required by a regulatory agency, or for other reasons required or permitted by law
- In connection with a sale or merger of ZFS's business
- In any circumstance that has the customer's written instruction or

Opt-Out Provisions

ZFS does not share nonpublic confidential and financial information with unaffiliated third parties except under the circumstances noted above. Sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, therefore no allowances are made for clients to opt out.

The USA Patriot Act

The USA PATRIOT ACT, signed by President Bush in 2001, is designed to detect, deter, and punish terrorists in the United States and abroad. The Act imposes anti-money laundering requirements on brokerage firms and financial institutions. The Act requires that firms positively verify the identity of their clients. For this reason, we ask for identification, such as a copy of a driver's license, at times during our relationship with you. We crosscheck this information against government-published lists of entities and persons known for or suspected of involvement in money laundering or terrorist activities.

What Does ZFS Do with Your Confidential Information?

Why? Financial companies choose how they share your confidential 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:

- Social Security number and Account Balances/Transaction History
- Employment Information and Credit History
- Company Information and Client Lists
- Assets and Investment Experience

How? All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons ZFS chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ZFS 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 and legal investigations, or as otherwise required	YES	NO
For our marketing purposes—to offer our products and services to you	YES	YES
For joint marketing with other financial companies	YES	YES
For our affiliates' everyday business purposes	YES	NO
For our affiliates to market to you	YES	YES
For non-affiliates to market to you	YES	YES

To limit our sharing contact the Compliance Department at service@zinvestglobal.com.

Questions? Please do not hesitate to contact us.

Please note: When you are no longer our customer, we continue to share information as described in this notice. However, you can contact us at any time to limit our sharing.