

## FACTS

### WHAT DOES LEVEL FOUR DO WITH YOUR PERSONAL INFORMATION?

#### Why?

The Firm(s) collects and develop personal information about clients and some of that information is non-public personal information (Customer Information). The essential purpose for collecting Customer Information is to provide and service the appropriate financial products and services clients obtain from the Firm(s). The Firm(s) may share client information with one or more of our affiliated companies (*companies related by common ownership or control*).

The affiliated companies of Level Four include Level Four Group LLC (LFG), Level Four Financial, LLC (LFF), Level Four Advisory Services, LLC (LFAS), Level Four Capital Management, LLC, (LFCM) and Level Four Insurance Services (LFIS) collectively (“the Firm(s)”). The Firm(s) may also have relationships with other non-affiliated (*companies not related by common ownership or control*) entities, including, insurance companies, trust companies, custodians and other financial institution entities.

#### What?

The categories of Customer Information collected by the Firm(s) depend upon the scope of the engagement with the individual affiliate entity and are generally described below. As investment advisers, LFAS and LFCM collect and develops Customer Information about clients in order to provide investment advisory services. As a broker dealer, LFF collects Customer Information about clients in order to provide brokerage services. Customer Information collected includes:

Information received from clients on financial inventories and questionnaires through consultation with referring Advisory and Brokerage Representatives. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning clients’ financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.

Information needed to open an account including social security numbers, investment experience, assets, income, account balances

Information developed as part of financial plans, analyses or investment advisory services.

Information concerning investment advisory account transactions, such as wrap account transactions.

Information about clients’ financial products and services transactions with LFAS, LFCM and LFF. When you are no longer our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customer’s 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 Level Four chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information   | Does Level Four share? | Can you limit this sharing? |
|--|------------------------|-----------------------------|
| <b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus   | Yes                    | No                          |
| <b>For our compliance with rules and regulations—</b> information about your transactions and communications provided to non-affiliated brokerage or investment advisory firms when required to comply with supervisory rules and regulations. | Yes                    | No                          |
| <b>For our marketing purposes—</b> to offer our products and services to you   | Yes                    | No                          |
| <b>For joint marketing with other financial companies</b>  | Yes                    | No                          |
| <b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences   | Yes                    | No                          |
| <b>For our affiliates' everyday business purposes—</b> information about your creditworthiness   | No                     | We don't share              |
| <b>For our affiliates to market to you</b>   | No                     | We don't share              |
| <b>For nonaffiliates to market to you</b>  | No                     | We don't share              |

| Who we are                           |   |
|--------------------------------------|---|
| <b>Who is providing this notice?</b> | Level Four Financial, LLC, Level Four Advisory Services, LLC and Level Four Capital Management, LLC |

| What we do   |  |
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| <b>How we share information with third parties</b> | <p>To administer, manage and service customer accounts, process transactions and provide related services for client accounts, it is necessary for Level Four to provide access to Customer Information within the Firm and its affiliated companies and to non-affiliated companies, other investment advisers, other broker-dealers, trust companies, custodians and insurance companies. The Firm(s) may also provide Customer Information outside of the Firm as permitted by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.</p> <p>LFAS and LFCM may also share information with Level Four Financial Services, LLC (LFF) which has supervisory obligations over certain of LFAS' and LFCM's activities. As a result of the relationship, LFF will have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about LFAS' clients, even if client does not establish any account through LFF.</p> <p>Level Four does not share Customer Information with affiliates or non-affiliated third parties for marketing purposes.</p> |

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| <b>How does Level Four protect my information?</b>  | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.  |
| <b>How does Level Four collect my personal information?</b>                               | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Open an account or perform transactions</li> <li>▪ Make a wire transfer or tell us where to send money</li> <li>▪ Tell us about your investment or retirement portfolio</li> </ul> <p>We also collect personal information from others such as credit bureaus, affiliates and other companies</p>  |
| <b>Why can't I limit all sharing?</b>   | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes- information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>   |
| <b>How do I limit sharing?</b>  | <p><b>If you choose to opt out now; at any time in the future; or wish to withdraw your opt out request, contact us at 866-834-1040. If it is your choice to opt out there will be a 30-day period before your opt out will take effect.</b></p> <p>Please note: If you are a new customer, we can begin sharing your information from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p> |
| <b>What happens when I limit sharing for an account I hold jointly with someone else?</b> | If Level Four provides services to a joint account, the Firm(s) will treat the opt-out request by a joint account owner as applying to all owners on the account(s) managed or serviced by any Level Four entity.  |

## Definitions

|                   |  |
|-------------------|--|
| <b>Affiliates</b> | <p>Companies related by common ownership, control, or directly involved in execution and settlement of client transactions. They can be financial and non-financial companies.</p> <p>The affiliated companies of Level Four include Level Four Group LLC (LFG), Level Four Financial, LLC (LFF), Level Four Advisory Services, LLC (LFAS), Level Four Capital Management, LLC, (LFCM) and Level Four Insurance Services (LFIS).</p> |
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|                        |   |
|------------------------|---|
| <b>Nonaffiliates</b>   | <p>Companies not related by common ownership, control, or directly involved in execution and settlement of client transactions. They can be financial and non-financial companies.</p> <p>The Firm(s) may also have relationships with other non-affiliated entities, including, insurance companies, trust companies, custodians and other financial institution entities.</p> <p>Additionally, our primary clearing firm, Raymond James &amp; Associates, is directly involved in execution and settlement of client transactions. Level Four also has execution and custody relationships with Charles Schwab, and Fidelity.</p> |
| <b>Joint Marketing</b> | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ Our joint marketing partners may include banks and credit unions</li> </ul>  |

## Other important information

Level Four understands that the relationship clients have with their Advisory Representative and/or Registered Representatives (“Representative”) is important. If a client’s Representative ends his or her affiliation with Level Four and he or she chooses to move to a different Firm, or if an Representative’s relationship with Level Four is terminated, the Representative may be allowed to take with him or her copies of all client and account documentation (including but not limited to: account applications; customer statements; and other pertinent forms related to the advisory services provided to the client by Level Four), so the Representative is able to continue the relationship with his or her client and continue providing services through his or her new firm. Level Four will also retain copies of its client and account documentation. Clients do not need to take action if it is their choice to allow their Representative to keep copies of their confidential information should he or she leave Level Four. **If you do not want your Advisory Representative to keep copies of your confidential information, should he or she decide to end the relationship with Level Four in the future, you have the right to opt out.**

**Vermont:** In accordance with Vermont law, we will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. Additional information concerning our privacy policies can be found at [levelfourfinancial.com](http://levelfourfinancial.com), [levelfouradvisors.com](http://levelfouradvisors.com) and/or [levelfourcapital.com](http://levelfourcapital.com) or call 866-834-1040.

**California:** In accordance with California law, we will not share information we collect about you with companies outside of Level Four Financial, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law. For additional information regarding your rights, please refer to the privacy notice (ccpa) for California residents at [levelfourfinancial.com](http://levelfourfinancial.com), [levelfouradvisors.com](http://levelfouradvisors.com) and/or [levelfourcapital.com](http://levelfourcapital.com).

**Nevada:** In accordance with Nevada law, if you would like to be placed on our Internal Do Not Call List, please call **866-834-1040**. For more information, you may contact Level Four Financial Services, 11 North Water Street, Ste 21290, Mobile, AL 36602, or the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101. Phone number: 1-702-486-3132; email: [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).

**For Insurance Customers in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR, and VA only.** The term “Information” in this section means customer information obtained in an insurance transaction. We may give your Information to state insurance officials, law enforcement, group policy holders about claims experience, or auditors as the law allows or requires. We may provide your Information to insurance support companies that may retain it or send it to others as needed to service your account. We may share your medical Information so we can learn if you qualify for coverage, process claims, or prevent fraud or if you provide authorization. **To see your Information, write to Level Four Advisory Services, LLC** at 12400 Coit Road, Suite 700, Dallas TX 75251. You must state your full name, address, the insurance company, policy number (if relevant), and the Information you are requesting. We will inform you of what Information we have. You may see and copy the Information (unless privileged) at our office or ask that we mail a copy to you for a fee. If you think any Information is incorrect, you may submit a written request to have the Information corrected. We will notify you of what actions are taken. If you do not agree with our actions, you may send us a statement.