



Privacy Policy

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Gramm-Leach-Bliley Act

Effective July 2001

IRC Securities is committed to respecting the privacy rights of your personal information. The primary reason we collect, use and share personal information is to serve you. Towards that end we have adopted the following policy to ensure that the Personal information you submit to us remains private and is used only for the purposes as set forth herein.

COLLECTION OF PERSONAL INFORMATION: We collect only relevant client and consumer information that we are allowed or required by law to obtain for conducting our business, such as:

- Information we receive from you on account applications or other forms, such as name, Social Security number, assets, income and similar information. We use this information to administer your accounts, provide customer services, and identify other products and services that may interest you.

USE AND SHARING OF PERSONAL INFORMATION: IRC Securities may match aggregated information with third party data. Also, as permitted or required by law, we may disclose some or all of the information described above with organizations outside of IRC Securities to service your accounts, improve our services, and provide products and services you have requested. Such organizations may include:

- Non-financial companies, such as companies that perform services on our behalf, companies that prepare account statements, or companies that assist us in marketing our services or communicating with you.
- Independent contractors or technical-system consultants who program our software, government agencies and regulators, consumer reporting agencies, and other outside parties as permitted or required by applicable laws.

PROTECTING THE CONFIDENTIALITY OF YOUR PERSONAL INFORMATION: All IRC Securities employees are instructed to observe strict standards of care regarding the confidentiality of your nonpublic personal information as outlined in the firm's policies. Employees who are found to be in violation of our Firm policies regarding your privacy rights are subject to disciplinary action. We maintain physical, electronic and procedural safeguards that comply with applicable laws to protect your nonpublic personal information and demand the same compliance from all third parties we deal with.

If you have any questions regarding IRC Securities Privacy Policy, please contact us at IRC Securities, LLC, Compliance Department, 420 Lexington Avenue, Suite 1430, New York, NY 10170 or 646-329-3050.