

Abraham & Co., Inc.

Privacy Policy 2018

At Abraham & Co., Inc. (Abeco), we are committed to protecting your privacy and the confidentiality of your personal and financial information. The measures we take to keep your personal information private and secure are outlined below.

How We Protect Confidentiality

Abeco uses procedural, physical and electronic system safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities.

When we enter into agreements with other companies to provide services to us or to make products and services available to you, we include a confidentiality clause. Under such an agreement, these companies may receive information about you, but they may only use it for the intended purpose - to benefit you.

Persons Covered by the Privacy Policy

The Abeco Privacy Policy applies to anyone who is a current or former Abeco brokerage or investment advisory client. We provide you with a copy of this policy when you open an account, and we send you annual notifications thereafter. If we change our policy regarding the sharing of information, we will notify you in advance and give you the opportunity to "opt out" of such disclosure.

How We Obtain Information About You

In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as non-public personal information, may be collected from several sources, including: applications and other forms you file with us (e.g., name, assets, income), records of transactions with us, non-affiliated third parties and others (e.g., credit report). Because we strive to provide you with the best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact your broker, financial advisor or Abeco management directly if you need to correct or update your personal information at: abeco@abrahamco.com

Sharing Your Information - With Whom and Why

Abeco does not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial service choices.

We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies: (1) We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s). An example would be our clearing agent, [Hilltop Securities, Inc.](#), that prints and mails your account statement. (2) We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with securities regulators or law enforcement authorities, to resolve consumer disputes, or to perform credit evaluations and authenticate checks.

Internet Security

We do not retrieve account or personal information from visitors who browse the public areas of our website.

Clients who have the ability to access their accounts online are required to log on to our secure websites with their user name and individually selected password. Your password is known solely to you and should never be shared with anyone. Each time you access your account please log off when you are finished. This will prevent someone else from accessing your account if you leave your computer unattended.

Abeco employees use information about you to respond to your needs and to provide you with information about specific products in which you may have an interest. We instruct our employees to use strict standards of care in handling the personal, confidential information of customers and remind them on a regular basis of their obligations with regard to the confidentiality of customer information.

Option to Opt-Out and Change Notices

If for any reason at any time in the future, we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure. For your reference, this Privacy Policy has been posted at www.abrahamco.com. If you have questions or concerns, please contact us via email at abeco@abrahamco.com.