

2025 Privacy Policy

This policy was last modified and is in *effect as of May 1, 2025*. This Privacy Policy is in effect for Thurston Springer Financial, Thurston Springer Advisors, TruEdge, Peak Brokerage Services and Blackridge Asset Management (collectively referred to as Thurston herein).

Protecting your privacy is very important to us. We value your trust and want you to understand what information we collect, how we use it, and how we protect it. The Gramm-Leach-Bliley Act, passed in November, 1999, requires that all companies distributing financial and insurance products to the public develop and publish a privacy policy. Our Privacy Policy provides information relating to how and when we share your information. A copy of our privacy policy is delivered to clients at the time of account opening - either hand-delivered or by mail, and annually thereafter - by mail, to the last known address. The policy is also available on our firm's websites. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to this privacy policy.

By using or accessing our Services, you accept the practices and policies outlined herein, and you consent that we will collect, use, and share your information as described in this Privacy Policy.

The Balance of Respecting Your Privacy & Sharing Information with Third Parties

As a matter of policy, Thurston does not disclose personal or account information provided by clients to non-affiliated third parties, except as follows:

- When required or permitted by law, or as necessary for third parties to perform their agreements with respect to services performed on our behalf.
- In limited circumstances, disclose or report personal information to non-affiliated third parties when the firm believes in good faith that disclosure is required under law, and to cooperate with regulators or law enforcement authorities as may be requested.
- Disclose information about client accounts to a non-affiliated third party at the client's request, or with the consent of the client.
- Disclose personal information that is necessary in providing administrative, custodial, or customer assistance, and in preparing, printing and delivering statements and other client related documents. These companies include clearing firms, mutual fund, annuity and other financial services companies that aid in fulfilling these services to our clients.
- Thurston does not provide information about our clients or former clients to any non-affiliated third party for marketing purposes.
- Other parties affiliated with Thurston include, but may not be limited to, Thurston Springer Insurance LLC, MyClient LLC, Financial Services Holdings LLC, Bristol Lane Group, LLC.

Personal Information We May Collect

During our relationship, Thurston may obtain nonpublic personal information from you (Customer Information). The information we obtain assists us in providing you with products and services, and also to satisfy regulatory requirements. This information may be obtained from various sources including, but not limited to:

- Identifiers (e.g., name, mailing address, email address, phone number)
- Characteristics of protected classifications (e.g., gender, age)
- Commercial information (e.g., purchases, marketing collateral requested, webinar registrations)

- Professional or employment-related information (e.g., employment status, employer)
- Internet or other electronic network activity (e.g., browse or search history, interaction with a website, application, or advertisement)
- Geolocation data (e.g., latitude or longitude)
- Inferences drawn from other data collected or from the above (e.g., preferences or characteristics)

Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

➤ **You**

When You Provide Such Information Directly to Us

- When you provide information in applications and related forms to obtain a financial product or service.
- When you provide information in free-form text boxes or respond to surveys.
- When you contact us.

When You Use our Services and Such Information Is Collected Automatically

- Through Cookies (see "[Tracking Tools](#)" below).
- If you use a location-enabled browser, we may receive information about your location and device.
- If you access certain applications and software we make available, we may receive and collect information transmitted from your device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.

Public Records or Sources

Information from the media, and other records and information that are made available by federal, state, or local government entities

Third Parties

Information obtained from other associations regarding any Service we may provide to you.

- Third-party reports, such as demographic and/or other information, if relevant to your Service.
- Information about your relationship with us, such as Services purchased, and/or account numbers, transaction information and balances.
- Analytics providers to analyze how you engage with the Services.
- Information to generate leads and create user profiles.
Information to assist us with marketing or promotional services including how you interact with our websites, applications, products, Services, advertisements, or communications.

Our Commercial or Business Purposes for Collecting Personal Data

We collect Personal Data about you for the following business purposes:

- Providing, Customizing and Improving our Services
- Creating and managing your account or other user profiles.

- Processing orders or other transactions.
- Providing you with the products, services, or information you request, including support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics, and product development.
- Personalizing the Services, website, and communications based on your preferences.
- Performing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Customer Information or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).

Opt-Out Provisions

As described above, Thurston does not provide information about you to any non-affiliated third parties for marketing purposes. Consequently, Thurston does not offer an opt out from the sale of Customer Information because we do not and have not, within at least the last 12 months, sold Customer Information that is subject to the CCPA’s sale limitation.

If your Financial Advisor leaves Thurston to join another financial firm that is a member of the Protocol for Broker Recruiting (to which our firm may be a signatory), we may permit your advisor to retain certain contact information that may be used by his/her new firm; limited to your name, address, email address, phone number, account title and account type. If you object to such information being retained by your Financial Advisor or shared with his/her new firm, you may opt-out by contacting our Compliance Department at 800-433-8049 or emailing Compliance@ThurstonSpringer.com.

Procedures to Safeguard Private Information

We use a combination of physical, technical, and organizational means to help safeguard your Customer Information under our control. A unique user id ,password and multi-factor authentication challenge are required to access certain Services. If issued to you, it is your responsibility to protect your username and password, and multi-factor authentication device.

We limit access to Customer Information to employees and your Financial Advisor or agent, and their successors and assigns, who may need it to fulfill their obligation to you for the Services for which you have subscribed or purchased, or to comply with federal or state laws, statutes, or regulations.

Employees of Thurston are trained to respect the confidentiality of your Customer Information and are required to keep such information confidential and secure.

We will inform you as soon as possible but not later than 30 days upon the identification of unauthorized access to your Customer Information. We will not provide notification if we determine that sensitive customer information has not been, and is not reasonably likely to be, used in a manner that would result in any substantial harm or inconvenience.

When accessing your account via a link from www.ThurstonSpringer.com using an internet browser, it is encrypted using Secure Socket Layer (SSL) 128-bit encrypted security. This technology is used to protect the confidentiality of your personal information.

Tracking Tools

Our Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser or

client, tell us how and when you access use our Services, analyze trends, learn about our user base and operate and improve our Services.

Please note that because of our use of Cookies, our Services do not support “Do Not Track” requests sent from a browser at this time. To find out more about “Do Not Track,” you can visit www.allaboutdnt.com.

Unless a user has not otherwise consented to our use of cookies, we insert cookies in some of our correspondence with users. We use these to collect information about you and your visit like date and time visited, length of time on site(s), pages visited, and general information about the device.

We may use third parties to target relevant advertising on other sites based on your online activity and interests. For more information about interest-based advertising, please visit Digital Advertising Alliance or the Network Advertising Initiative.

You can opt-out of seeing personalized ads by using the DAA opt-out tool or the NAI opt-out tool. Please note you will still see ads even if you opt-out, but they will not be personalized.

Google Analytics - We may employ the use of a tool called “Google Analytics” to collect information about use of our website and our products. We use the information we get from Google Analytics only to improve our site and our products. We do not combine the information collected using Google Analytics with personally identifiable information. For more information on how Google uses data when we use their partners’ websites or apps, visit <https://policies.google.com/technologies/partner-sites>.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Data. To learn more about your California privacy rights, visit <https://oag.ca.gov/privacy/privacy-laws> and see the Privacy Notice for California Residents section of this Policy.

Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained in our Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA). This notice does not apply to employment-related Personal Data collected from California-based employees, job applicants, contractors, or similar individuals.

Notice to European Users

Our Services are targeted for users in the United States of America and Canada. Any information you enter regarding our Services may be transferred outside of the European Union to the United States of America which does not offer an equivalent level of protection to that required in the European Union. You are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. Article 26 of the European Union’s Data Protection Directive (Directive 95/46/EC, 1995 O.J. (L 281) 31) allows for transfer of Personal Data from the European Union to a third country if the individual has unambiguously given his consent to the transfer of Personal Data, regardless of the third country’s level of protection. By using our Services, you consent to the transfer of all such information to the United States of America which may not offer an equivalent level of protection to that required in the European Union and to the processing of that information by the Company on its servers located in the United States of America as described in this Privacy Policy.

Changes to Our Privacy Policy

We reserve the right to make corrections or updates to this Privacy Notice at our discretion from time to time. When we do so, we will post the updated Privacy Notice on our website and update the Privacy Notice's Effective Date. We will notify you of material changes to this Privacy Notice. The date the privacy policy was last revised will be identified. Your use of our Services after any changes to the Privacy Policy have been posted is your consent and agreement to all of the changes. We encourage you to periodically review this Privacy Notice.

Your Rights and Choices

Access

You have the right to request that we disclose certain information to you about our collection and use of your Customer Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you (to the extent required by law):

- The categories of Customer Information we collected about you.
- The categories of sources for the Customer Information we collected about you.
- Our business or commercial purpose for collecting or selling that Customer Information.
- The categories of third parties with whom we share that Customer Information.
- The specific pieces of Customer Information we collected about you (also called a data portability request).

Deletion

You have the right to request that we delete any of your Customer Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your Customer Information from our records, unless an exception applies.

Personal Data Sales Opt-Out and Opt-In

The CCPA defines a "sale" as the disclosure of Customer Information for monetary or other valuable consideration. Thurston does not offer an opt out from the sale of Customer Information because we do not and have not within at least the last 12 months sold Customer Information that is subject to the CCPA's sale limitation.

Exercising Access and Deletion Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Customer Information, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Customer Information provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you for making a Valid Request unless your Valid Request(s) is excessive, repetitive, or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request via email to our Compliance Department at Compliance@ThurstonSpringer.com.

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Responding to Requests

We cannot respond to your request or provide you with your Customer Information if we cannot verify your identity or authority to make the request and confirm the Customer Information relates to you. We will only use Customer Information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

Privacy and data protection laws, other than the CCPA, apply to much of the Customer Information that we collect, use, and disclose. When these laws apply, Customer Information may be exempt from, or outside the scope of, Access Requests and Deletion Requests. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability, is exempt from CCPA Requests. As a result, in some instances, we may decline all or part of an Access Request or Deletion Request related to Customer Information exempt from CCPA Requests. This means that we may not provide some or all of this Customer Information when you make an Access Request. Also, we may not delete some or all of this Customer Information when you make a Deletion Request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. We will not deny you goods or services.

- Charge you different prices or rates for our Services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of service.
- Suggest that you may receive a different price or rate for our Services or a different level or quality.

Thurston does not sell your Customer Information; therefore, CCPA-permitted financial incentives are not applicable.

Contact Information

If you have any questions or concerns, please feel free to contact our Compliance Department at 800-433-8049 or emailing Compliance@ThurstonSpringer.com.