



CALIFORNIA PRIVACY NOTICE

Last updated January 1, 2020

1. LEGAL ENTITIES

SCF Securities, Inc. SCF Investment Advisors, Inc. SCF Marketing, Inc.

2. APPLICABILITY

Your privacy is important to us. This California Consumer Privacy Act notice explains how the legal entities listed above (“Company,” “we,” or “us”) collect, use, and disclose personal information relating to California residents covered by the California Consumer Privacy Act of 2018 (“CCPA”). This notice is provided pursuant to the CCPA.

3. INTRODUCTION

SCF Securities, Inc. maintains physical, electronic and procedural safeguards to protect confidential customer information. SCF takes precautions to ensure the information we collect about you is protected and is accessed only by authorized individuals or organizations. Our employees are trained about privacy and are required to safeguard confidential customer information.

4. EXCEPTIONS TO THE CCPA

Under the CCPA, ‘Personal Information’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”).

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our general [Privacy Notice](#).

Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

5. COLLECTION AND DISCLOSURE OF PERSONAL INFORMATION

In the past 12 months, we have collected and have disclosed, but not sold to any third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

- Identifiers, such as name and government-issued identifier (e.g., Social Security number);
- Personal information, as defined in the California safeguards law, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Internet or network activity information, such as browsing history and interactions with our website;
- Audio, electronic, visual and similar information, such as call recordings; and
- Professional, employment-related information or financial information, such as current employer and annual income, net worth, liquid net worth.

The categories of sources from whom we collected this Personal Information are:

- Directly from a California resident or the individual's representatives
- Information from our Affiliates

The categories of third parties to whom we may disclose Personal Information for our business purposes described in this privacy disclosure are:

- Affiliates
- Companies that perform administrative or marketing services on our behalf
- Product sponsor companies
- Parent company and subsidiaries
- Custodians
- Clearing firms
- Certain third-party data management providers
- Transfer agents
- Data protection servicer

6. USE OF PERSONAL INFORMATION

In the past 12 months, we have used Personal Information relating to California residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions.
- Verifying customer information.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions).

7. SALE OF PERSONAL INFORMATION

In the past 12 months, we have not “sold” Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Disclosure, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

8. RIGHTS UNDER THE CCPA

If you are a California resident, you have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - a. the categories of Personal Information about you that we collected;
 - b. the categories of sources from which the Personal Information was collected;
 - c. the purpose for collecting Personal Information about you;
 - d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 - e. the specific pieces of Personal Information we collected about you.
2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception.
3. Be free from unlawful discrimination for exercising your rights under the CCPA.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not

honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

9. HOW TO EXERCISE YOUR RIGHTS

If you are a California resident, you may submit a request by:

1. Writing us at:

SCF Securities, Inc.
155 E. Shaw Ave. Suite 102
Fresno, CA. 93710
2. Calling 800.955.2571
3. Emailing us at Compliance@scfinc.com

10. QUESTIONS OR CONCERNS

You may contact us with questions or concerns about this Disclosure and our practices by:

1. Writing us at:

SCF Securities, Inc.
155 E. Shaw Ave. Suite 102
Fresno, CA. 93710
2. Calling 800.955.2571
3. Emailing us at Compliance@scfinc.com

11. CHANGES TO THIS CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

We may change or update this Disclosure from time to time. When we do, we will post the revised Disclosure on this page with a new "Last Updated" date.