# THE OAK RIDGE FINANCIAL SERVICES GROUP, INC.

Member FINRA/SIPC

### PRIVACY POLICY

At The Oak Ridge Financial Services Group, Inc. (OAK RIDGE) 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. OAK RIDGE is a fully disclosed broker dealer and clears through RBC Custody & Clearing, a division of RBC Capital Markets, LLC, member NYSE/FINRA/SIPC.

#### HOW WE PROTECT CONFIDENTIALITY

OAK RIDGE 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 many receive information about you, but they may only use it for the intended purpose – to benefit you.

#### PERSONS COVERED BY THE PRIVACY POLICY

The OAK RIDGE Privacy Policy applies to anyone who is a current or former OAK RIDGE client. We provide you with a copy of this policy when you open an account, and we send you annual notification 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 nonpublic personal information, may be collected from several sources, including applications and other forms you file with us (e.g., name, assets, and income); records of transactions with us, our affiliates, 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 it is correct. Please contact your account representative or OAK RIDGE directly if you need to connect or update your personal information.

#### SHARING INFORMATION-WITH WHOM AND WHY

OAK RIDGE 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.

No mobile opt-in will be shared with third parties for marketing purposes.

We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies:

We disclose personal information to service providers that assist us in processing your transaction or servicing your account(s). An example would be the company that prints and mails your account statement. 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, to perform credit evaluations and authenticate checks.

OAK RIDGE is a subsidiary of Oak Ridge Acquisition Corporation. Since affiliates are all part of one corporate family, they work with one another and may work together to service your financial needs. The sharing of your information among our affiliates enables us to serve you more efficiently and makes it more convenient for you to do business with us. We are permitted by law to share information with our affiliates about your account history and your experiences with us. All our affiliates follow similar privacy policies.

When you access your account online, it is through a Secure Socket Layer-encrypted session between your browser and our servers. To ensure the highest level of security, we have installed VeriSign Global Server IDs on each server. We will continue to enhance security procedures as new technologies become available. Each time you access your account, please don't forget to log off when you are finished. This will prevent someone else from accessing your account if you leave your computer and your session hasn't automatically shut down.

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