



Please carefully read this *Privacy Policy* and our *Terms of Use* before using our Website.

Thank you for visiting the website Highland Capital Brokerage, Inc. (future references to “Company” or “we” or “our” or “us” include Highland Capital Brokerage, Inc. and its subsidiaries, divisions, and affiliates).

This Website Privacy Policy (“*Privacy Policy*”) applies to the Company website located at **www.highlandbrokerage.com**, and all associated sites controlled by Company and linked to **www.highlandbrokerage.com** by the Company and its subsidiaries (collectively, the “Website”) and includes information provided on this Website, in email, text and other electronic messages between you and this Website, through any applications that may be downloaded from this Website, and through other sources which you may use to convey information to the Company through the Website. This policy does not apply to information collected by the Company offline or through any other means, including on any other website operated by the Company or any third party.

Your privacy is important to us and we are committed to protecting it through our compliance with this Privacy Policy. To better protect your privacy, we provide this notice, which explains:

- The information we collect through our Website and why we collect it
- How we may use or disclose your information
- The choices you can make about the way your information is collected, used, maintained, protected and disclosed.

Please carefully read this Privacy Policy and our Terms of Use. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using our Website, you agree to this Privacy Policy. This policy may change from time to time (see *Changes to this Privacy Policy*). Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. Furthermore, please see our *Terms of Use* for additional information applicable to the use of our Website.

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## The Information We Collect About You and How We Collect It

You do not have to give us personally identifiable information in order to visit our Website. We may, however, need personal information in order to provide services that you request, and this Privacy Policy explains data collection and use in those situations.

### Personally Identifiable Information

Personally identifiable information is generally provided and collected when you search, post, register, participate in a questionnaire, or communicate with customer service. As a result of those actions, you may supply us with such information as your name, address, phone numbers, email address, contact preferences, and information relating to a support or service issue. This information may, alone or in combination with other data, constitute personally identifiable information. If we collect personally identifiable information from you, you are giving us permission to use that information for the specific purpose for which it is provided and to contact you regarding site services, improve or enhance site performance, to offer you information regarding products and services, improve our Website, to communicate to you about other matters that may be of interest to you and for any other purpose described in this Privacy Policy. Users unwilling to provide personally identifiable information online are free to contact us at [Compliance@highland.com](mailto:Compliance@highland.com).

### Non-Personally Identifiable Information

In addition, we may collect, store, and use certain non-personally identifiable information when you visit our Website. This may include, information about your computer hardware and software, such as the type of browser you are using (e.g., Safari, Internet Explorer, Firefox), the type of operating system you are using, (e.g., Windows Vista or Mac OS X), the domain name of your internet service provider (e.g., America Online, EarthLink), access times and referring website addresses, and other information collected through cookies or other tracking technologies (see Usage Details). In addition, we collect information about which pages you visit within our Website. This site visitation data is identified only by a unique ID number, and it is never linked with personal information unless a user consents, as described in this Privacy Policy.

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## How We May Use or Disclose Your Information

### Overview of Potential Uses of Your Information

Information about you and our other customers is an important part of our business. We use your personal information for the following purposes:

- To help us create, publish and otherwise tailor the content of our Website to ensure it is relevant to your needs.
- To deliver services, such as newsletters, events, training or software that you request or purchase.
- To alert you to updated information and other new services from the Company, if you so request.
- To provide you with access to limited-entry areas of our Website, as appropriate.

We may merge site-visitation data with anonymous demographic information for research purposes, and we may use this information in the aggregate to provide more relevant content. In some limited-entry sections of our Website, with your approval, we will combine site-visitation data with your personal information in order to provide you with personalized content. If you decline permission, we will not provide you the personalized service and we will not merge your personal information with site-visitation data.

We may send out periodic e-mails informing you of technical service or security issues related to a product or service you requested, or confirming you requested a product or service. You will not be able to choose to unsubscribe to these mailings, as they are considered an essential part of the service you have chosen.

### **Overview of Potential Disclosures of Your Information**

Information about our customers is an important part of our business, and we are not in the business of selling personally identifiable information to unaffiliated third parties for their commercial use. When you register, or otherwise give us personal information, we will not share that information with third parties without your permission, other than as described herein.

- **In Compliance with Law or Court Order:** We reserve the right to share your personal information with third parties if required to do so by law or if we believe such action is necessary in order to: (a) conform with the requirements of the law or to comply with legal process served upon us; (b) protect or defend our legal rights or property, the Website, or our users; and (c) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.
- **Agents:** We employ or may employ other companies and individuals to perform functions on our behalf. Examples of such functions include removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), and providing customer service. These companies and individuals have access to personal information needed to perform their functions, but may not use it for other purposes.
- **Offers:** We may send offers to selected groups of customers on behalf of other businesses. If we do this, we will not give that business your name and address.
- **Business Transfers:** As we continue to develop our business, we might sell or buy subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the customer consents otherwise). Also, in the event that we are acquired or assigned, customer information will of course be one of the transferred assets.
- **Protection of our Website and Others:** We reserve the right to release account and other personal information when we believe release is appropriate to comply with the law, enforce or apply our Terms and Conditions of Website Use and other agreements, or protect the rights, property, or safety of the Company, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. However, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.
- **With Your Consent:** Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information (“opt-out”).

### **Other Information about the Use and Disclosure of Your Information**

We sometimes use the non-personally identifiable information that we collect to monitor user traffic patterns, analyze and quantify user preferences, improve the design and content of our Website, and enable us to personalize your user experience. All such usage data shall be the exclusive property of this Website.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed or accessed by a third party in a manner that is inconsistent with this Privacy Policy.

We may on occasion combine information we receive online with outside records to enhance our ability to market to you those products and services that may be of interest to you. If you have signed up to receive our emails and prefer not to receive marketing information from this Website, please follow the “unsubscribe” instructions provided on any marketing email you receive from this Website.

Finally, this Website will not use or transfer personally identifiable information provided to us in ways unrelated to the ones described above without also providing you with an opportunity to opt out of these unrelated uses.

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### **Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [Compliance@highland.com](mailto:Compliance@highland.com).

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### **Changes to or Removal of Your Personal Information**

If at any time you wish to change, correct, or update the personally identifiable information submitted to the Company, or otherwise have it removed from our database, you may do so at any time by submitting a request by email to [Compliance@highland.com](mailto:Compliance@highland.com). We do not sell or disclose your personal information to third parties for their direct marketing purposes.

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### **Usage Details**

#### **Cookies**

To enhance your experience with our Website, many of our web pages use “cookies.” Cookies are text files we place in your computer’s browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at our Website. However, once you choose to furnish our Website with personally identifiable information, this information may be linked to the data stored in the cookie.

We use cookies to understand site usage and to improve the content and offerings on our Website. For example, we may use cookies to personalize your experience at our web pages (e.g., to recognize you by name when you return to our Website), save your password in password-protected areas, and enable you to use shopping carts on our Website. We also may use cookies to offer you products, programs, or services.

**Flash Cookies**

Certain features of our Website may use local stored objects (or “flash cookies”) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

**Web Beacons**

“Web beacons” or clear .gifs are small pieces of code placed on a web page to monitor the behavior and collect data about the visitors viewing a web page. For example, web beacons or similar technology can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. We may use web beacons or similar technology on this Website from time to time for this and other purposes.

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**Collection of Information by Third-Party Sites, Ad Servers, and Sponsors**

Our Website may contain links to other websites whose information practices may be different than ours. While visiting this Website, you may link to another website via a window opened within (or on top of) our Website. Our privacy policies and procedures may or may not be consistent with the policies and procedures of other websites you visit while here. Users should consult, read, and understand any other website’s privacy notices before choosing to provide personally identifiable data on such linked website. Our Privacy Policy and treatment of your data does not apply on third party websites and we have no control over information that is submitted to, or collected by, these third parties.

Our Website sometimes may offer products, services or content (e.g., promotions) that are sponsored by or cobranded with identified third parties. By virtue of these relationships, the third parties typically have access to the personally identifiable information that you submit, if any, in connection with that offering in order to participate in such particular Website activity. We have no control over these third parties’ use of this information.

Our Website may use a third party to present or serve the advertisements that you may see on our Web pages. These third party ad servers may use cookies, web beacons, clear .gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements’ effectiveness. The use of these technologies by these third party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.

Our Website may include links to the sites of other companies, including providers of insurance products and related services. These third parties may collect, use, and store personal information about you. We are not responsible for the privacy practices of such unaffiliated third parties and this Privacy Policy does not apply to their use of your information. We encourage you to learn about the privacy policies of those companies.

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**Our Commitment to Information Security**

We have put in place what we believe to be reasonable physical, electronic, and managerial procedures to safeguard your personally identifiable information that we collect and to help prevent its unauthorized access and use. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. To assist in keeping your personal information safe, you must use an SSL-enabled browser (i.e., Internet Explorer).

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Additionally, change your passwords often using a combination of letters and numbers, and make sure you use a secure web browser.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

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### Children under the Age of 13

Our Website is not directed towards children and we do not knowingly collect information from children. If you believe we have any information from or about a child under the age of 13, please contact us at [Compliance@highland.com](mailto:Compliance@highland.com).

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### HIPAA Compliance

As a provider of services and products related to the healthcare industry, we have implemented programs to address the privacy and security implications of the rules promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

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### Usage Terms

Access to and use of this Website is subject to compliance with our Terms of Use

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### Changes to this Privacy Policy

We reserve the right to make changes to our Privacy Policy from time to time for any reason. Such changes, modifications, additions or deletions shall be effective immediately upon posting, unless otherwise indicated. We have no duty or obligation to inform prior visitors that changes have been made, regardless of the scope and importance of the changes. If we make material changes to our Privacy Policy, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified on the Website page which contains the Privacy Policy. You are responsible for periodically visiting our Website and this privacy policy to check for any changes, and notifying the Company with any issues.

We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. Your continued use of the Website after such changes are posted will be deemed to constitute your agreement to and acceptance of such changes.

#### HOW TO CONTACT US

If you have any additional questions or concerns about this Privacy Policy or its implementation, you may contact us directly by email at [Compliance@highland.com](mailto:Compliance@highland.com).

