

## Privacy Policy

**Our Commitment to Your Privacy:** Holder Broker a.d. has a standing policy of protecting the confidentiality and security of information we collect about our customers. We will not share nonpublic information about you ("Information", as further described below) with third parties, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

**Why We Collect And How We Use Information:** We limit the collection and use of Information to the minimum we require to deliver superior service as your broker. We collect nonpublic personal information about you from the following sources: Information we receive from you on applications or other forms. Information about transactions with our affiliates, others, or us and information we may receive from a consumer-reporting agency.

**How We Gather Information:** We get most Information directly from you, when you apply for, access and use financial products and services provided by us- whether in person, by telephone or electronically. We may verify this information or get additional information direct or indirectly from consumer reporting agencies or public sources. This Information may relate to your finances, employment, avocations, or other personal characteristics, as well as transactions and interactions with, others or us.

**How We Protect Information:** Our employees are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so, such as to administer our products or services. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with Federal standards. Employees who violate our Privacy Policy are subject to disciplinary actions.

**Disclosure of Information:** We may disclose and Information (as described above) to or as directed by you or when we believe it necessary for the conduct of our business, or where the law otherwise permits disclosure. It is Holder Broker's policy to require all third parties who receive any Information to sign strict confidentiality and nondisclosure agreements.

**Former Customers:** Even if you are no longer a customer of ours for which we provided services, our Privacy Policy will continue to apply to you.

**To Whom This Policy Applies:** This Privacy Policy applies to products or services provided by Holder Broker a.d. (and its third party service providers), used primarily for personal, family, or household purposes (not business purposes).

**Access to and Correction of Information:** If you desire to review any file we may maintain for your personal Information, please contact your broker or salesman. If your broker, salesman or you notify us that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.