Privacy Policy and GLBA Consumer Privacy Notice

1. Overview and Regulatory Framework

This Privacy Policy complies with the Gramm-Leach-Bliley Act (GLBA), SEC Regulation S-P (including the Safeguards Rule), SEC Rules 17a-3 and 17a-4, FINRA Rules 3110 and 4511, the Bank Secrecy Act, and applicable U.S. state privacy laws including CCPA/CPRA and analogous regimes.

2. Nonpublic Personal Information (NPI)

Nonpublic Personal Information includes personally identifiable financial information provided by customers, resulting from transactions, or obtained in connection with providing financial services.

3. Information Collected

We collect identifiers, financial information, sensitive personal information, internet activity, and profile/suitability data necessary to operate a self-clearing broker-dealer and meet regulatory obligations.

4. Purposes Of Use

Information is used for account servicing, execution, clearing and settlement, corporate actions processing, regulatory reporting (including CAT and CAIS), AML/KYC compliance, fraud detection, supervision, cybersecurity, and operational analytics.

5. Information Sharing, Affiliate Marketing and Related Services

Adelphi does not share personal information with nonaffiliated third parties for their independent marketing purposes. Adelphi does not engage in cross-context behavioral advertising and does not share personal information for such purposes.

Adelphi may use personal information collected in connection with your account to market its own products and services. Adelphi and its affiliates may also use such information for operational, compliance, and administrative purposes, and to offer related financial products and services, including investment advisory and asset management offerings.

Adelphi may share personal information with regulators, clearing agencies (including Depository Trust & Clearing Corporation and National Securities Clearing Corporation), service providers under contractual restrictions, affiliates, and professional advisors. Such parties are contractually limited to specific uses and are required to maintain confidentiality and appropriate safeguards.

To the extent required by applicable law, Adelphi will provide customers with the opportunity to opt out of certain affiliate marketing uses of their information, and may honor such opt-out elections in accordance with applicable legal requirements.

6. Reg S-P Safeguards Program

Adelphi maintains a Written Information Security Program that includes governance oversight, a designated Information Security Officer, periodic risk assessments, encryption, access controls, monitoring, vendor oversight, and periodic testing of controls.

7. Incident Response and Data Breach

Adelphi maintains a formal incident response program including detection, escalation to compliance and senior management, investigation, containment, regulatory coordination, and notification to affected individuals in accordance with applicable federal and state data breach laws. All incidents are documented and evaluated for reporting obligations.

8. Data Retention

Personal information is retained in accordance with SEC Rule 17a-4 (generally no less than six years), FINRA requirements, and other applicable legal obligations.

9. State-Specific Disclosures

Personal information is collected and used solely for business purposes including account servicing, transaction processing, regulatory compliance, fraud detection, and analytics.

Categories of personal information are used as follows:

a. Identifiers: account opening, verification
b. Financial information: transaction processing and reporting
c. Internet activity: security and fraud detection
d. Profile data: suitability and compliance

Data is not retained longer than necessary to meet regulatory obligations. Adelphi does not sell personal information. Certain disclosures may constitute 'sharing' under California law but are limited to operational purposes.

10. State Privacy Rights

Consumers may have rights to access, correct, delete, and obtain copies of personal information, and to opt out of certain data sharing. Certain rights described herein may not apply to personal information collected, processed, or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations.

11. California Privacy Rights

California residents have rights to access, correct, delete, and limit use of sensitive personal information. Sensitive personal information is used solely for purposes permitted under applicable law, including security, identity verification, and regulatory compliance. Adelphi does not sell personal information. Adelphi does not engage in cross-context behavioral advertising and does not share personal information for such purposes.

12. Minors and Account Eligibility

Individuals under 18 may not open accounts independently. Custodial accounts for minors are permitted only through a parent or legal guardian in accordance with UGMA/UTMA. Information relating to minors is processed solely under guardian authorization. We do not knowingly collect information from individuals under 13 without parental consent.

13. Opt-Out and Request Methods

Customers may submit privacy-related requests, including requests to access, correct, delete, or opt out of certain data processing or sharing activities, by contacting Adelphi at privacy@adelphis.co. All requests are subject to identity verification and applicable legal limitations.

Certain requests may not be feasible due to Adelphi's obligations under applicable securities laws, including requirements related to recordkeeping, supervision, anti-money laundering, fraud prevention, and regulatory reporting.

Adelphi's services rely on integrated affiliate and service provider relationships that are essential to the operation of customer accounts. As a result, certain limitations on data use or sharing may not be operationally feasible.

Where a customer request conflicts with Adelphi's legal, regulatory, or operational obligations, Adelphi may limit or deny the request. If such limitations prevent Adelphi from reasonably servicing the account, Adelphi may, in its discretion and in accordance with applicable law, restrict or close the account.

14. Cookies and Tracking

Cookies are used for authentication, security, and analytics. Users may manage cookie preferences via browser settings.

15. Monitoring and Supervision

Communications and systems are monitored in accordance with FINRA Rule 3110 and applicable securities laws.

16. International Transfers

Data may be processed outside your jurisdiction subject to contractual safeguards and applicable legal protections.

17. Governance

Privacy practices are overseen by Compliance, Legal, and Information Security with periodic review and internal controls.

When you are no longer our customer, we continue to share your information as described in this notice.

18. Contact

privacy@adelphis.co

GLBA Consumer Privacy Notice

WHAT DOES ADELPHI STOCK BROKERS INC. DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all, sharing.

Why can't I limit all sharing?
Federal law gives you the right to limit only certain types of sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information.

What?

The types of personal information we collect and share depend on the product or service you have with us. This includes Social Security number, account balances, transaction history, and investment experience.

How?

All financial companies need to share customers' personal information to run their everyday business. Below we list the reasons companies can share and whether you can limit this sharing.

Sharing Practices

Reasons we can share your personal information	**Does Adelphi share?**	**Can you limit this?**
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	Yes
For our affiliates' everyday business purposes — information about your creditworthiness	Yes	No
For nonaffiliates to market to you	No	N/A

To limit our sharing, contact us at **privacy@adelphis.co**.
Federal law gives you the right to limit only certain types of sharing.

How we protect your information
We use security measures that comply with federal law including encryption, access controls, and secure systems.

Definitions (for purposes of this notice)
Affiliates: Companies related by common ownership or control
Nonaffiliates: Companies not related by common ownership or control
Joint marketing: Agreements between financial companies to market products or services

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