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

We do not sell personal information. We may share information with regulators, clearing agencies (DTCC/NSCC), service providers under contractual restrictions, affiliates, and professional advisors. Service providers are contractually restricted to specific uses and required to maintain confidentiality and safeguards.

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

Records are retained in accordance with SEC Rule 17a-4 and FINRA Rule 4511 based on regulatory requirements, account lifecycle, and 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. 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. Sensitive personal information is used only for permitted purposes such as security, identity verification, and compliance.

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. These rights are subject to exemptions under GLBA and applicable securities regulations.

11. California Privacy Rights

California residents have rights to access, correct, delete, and limit use of sensitive personal information. Adelphi does not sell personal information.

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, through an available web portal, or via an authorized agent. 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, but not limited to, requirements related to recordkeeping, supervision, anti-money laundering, fraud prevention, and regulatory reporting.

Where a customer request materially conflicts with Adelphi’s ability to meet its legal and regulatory obligations or to maintain the operational integrity of the account, Adelphi reserves the right to limit or deny such request. In circumstances where continued servicing of the account is not reasonably feasible as a result of such limitations, Adelphi may, in its discretion and in accordance with applicable law, restrict or close the customer’s 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.

18. Contact

privacy@adelphis.co

GLBA Consumer Privacy Notice

Sharing Practices

Reasons we can share your personal information	Does Adelphi share?	Can you limit this?
Everyday business purposes	Yes	No
Our marketing purposes	Yes	No
Joint marketing	Yes	No
Affiliates' everyday business purposes	Yes	No
Affiliates to market to you	Yes	Yes
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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