

## ***CUSTOMER IDENTIFICATION PROGRAM (CIP), SIPC, PRIVACY, AND DATA PROTECTION***

### **CIP**

*United States Federal law requires all financial institutions to obtain, verify against various government lists, and record information that identifies each person, who opens a brokerage account or otherwise establishes a customer relationship with a broker dealer. As a Financial Industry Regulatory Authority (“FINRA”) member broker dealer registered with the Securities and Exchange Commission (“SEC”), and specializing in private investments, investment banking, and wealth management, Independent Brokerage Solutions LLC will maintain on file copies of each customer investor’s new account and subscription documentation, which include for:*

- Investors, who are natural persons - name, residential address, date of birth, and other verification information that will allow Independent Brokerage Solutions LLC to identify you;
- Investors, which are entities or organizations - the name, physical location, and other official documentation identifying the entity’s existence.

### **SIPC NOTICE**

*The role of the Securities Investor Protection Corporation (SIPC) is to return funds and securities to investors if the broker-dealer holding these assets becomes insolvent. You may obtain more information about SIPC, including the SIPC brochure, at SIPC’s Web site at [www.sipc.org](http://www.sipc.org); or, by calling them at (202) 371-8300).*

## **PRIVACY AND DATA PROTECTION**

### **Overview**

Independent Brokerage Solutions LLC (“IndieBrokers”; the “Firm”) is committed to handling your information responsibly. Your information is kept confidential. This commitment applies to the individuals, households, businesses, and other persons that establish a business relationship with the Firm, whether by opening a brokerage account, or by investing in a private placement or other private investment activity conducted by the Firm.

Under the Gramm-Leach-Bliley Act (“GLBA”) and SEC Regulation S-P, FINRA member firms, other financial institutions, and registered investment advisors, are required to adopt written policies and procedures that address the protection of customer information and records.

Independent Brokerage Solutions LLC and its registered representatives have adopted such procedures and strongly believe in protecting the confidentiality and security of personal information we collect from you. Our employees and other registered representatives are instructed to protect the confidentiality of information in the Firm's possession and are required to comply with our established written policies and procedures.

### **Privacy Policies and Procedures**

IndieBrokers may collect nonpublic personal information about you from the following sources:

- Information we receive from you to open an account; enter into an agreement; or, subscribe to a private placement
- Information about your transactions with us, our affiliates, other funds, or managers; and
- Information we may receive from a consumer reporting agency.

IndieBrokers only discloses nonpublic information about you to other entities on a need-to-know basis in order to process transactions on your behalf, whether

- in a brokerage account
- in a public or private offering
- to respond to inquiries from you or your authorized representative; or,
- to fulfill legal and regulatory requirements.

The Firm does not make any disclosures of information to any other companies, which may want to sell their products or services to you.

### **Securing Your Data**

IndieBrokers' business is dependent, to a great extent, on digital technology to process its business and interact with customers. Accordingly, safeguards are constantly being evaluated and implemented, including

- Firm employees are trained to implement the IndieBrokers policies and procedures, including the obligation
  - To maintain the confidentiality of customer information
  - To maintain password protection on all devices
  - To be cautious or not use Wi-Fi where customer or Firm information could be compromised
  - To avoid displaying confidential information where such information could be compromised

- To not use of third-party vendors (such as cloud storage) not approved by the Firm
- Risks in the Firm's secure password protected systems are identified, reviewed, and updated in an ongoing manner
  - Third-party vendors with access to the Firm's systems or devices (if in use) are evaluated prior to engagement and periodically
  - Network systems of the Firm are password protected and permissioned on a need to know basis
  - Computers or other data-retaining equipment to be disposed of are subject to complete data removal prior to disposal

**Our Commitment to You**

The protection of client data is a critical part of our responsibility to protect client assets – your assets and information. IndieBrokers has procedures to help ensure the confidentiality and security of client records and information. From access controls to protect against unauthorized access to our information systems, to employee training to help prevent the most preventable means that hackers and other thieves use to gain illicit access, IndieBrokers is committed to protecting the confidentiality and security of the personal information we collect from you.

**Independent Brokerage Solutions LLC**  
**485 Madison Avenue**  
**New York, NY 10022**

-----

**Questions? Please Call: 212-751-4424; or email Bryon H. Lyons: [BLyons@IndieBrokers.com](mailto:BLyons@IndieBrokers.com)**

-----

©2024 Independent Brokerage Solutions LLC Member: FINRA/SIPC. The information contained in this disclosure document is provided by IndieBrokers for informational purposes only, and nothing contained herein shall be construed to amend, supplement, or otherwise modify any of the terms and conditions set forth in any customer or advisory agreement between you and IndieBrokers.