

Privacy Policy

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 Rev. August 2019

What Does Constellation Trust Company (“CTC”) 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. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Employment information
- Account balances
- Account transactions
- Income
- Investment experience

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

How?

All financial companies need to share a customer’s personal information to run their everyday business - to process transactions, maintain customer accounts, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customer’s personal information; the reasons CTC chooses to share; and whether you can limit this sharing.

Reasons We Can Share Your Personal Information	Does CTC Share?	Can You Limit This Sharing?
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

Reasons We Can Share Your Personal Information	Does CTC Share?	Can You Limit This Sharing?
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes—information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness	No	We Don't Share
For nonaffiliates to market to you	No	We Don't Share

Who We Are

Who is Providing This Notice?

Constellation Trust Company

What We Do

How Does CTC Protect My Personal Information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How Does CTC Collect My Personal Information?

We collect your personal information, for example, when you

- open an account
- give us your income information
- provide employment information
- provide account information
- give us your contact information

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why Can't I Limit All Sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Affiliates of CTC include:

- *Advizr, Inc.*
- *CLS Investments, LLC*
- *NorthStar Advizr Holdings, Inc.*
- *NorthStar CTC Holdings, Inc.*
- *NorthStar Financial Services Group, LLC*
- *NorthStar Topco, LLC*
- *Orion Advisor Solutions, LLC*
- *Orion Advisor Technology, LLC*
- *Orion Portfolio Solutions, LLC*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *CTC does not share with nonaffiliates so they can market to you.*

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products and services to you.

- *Our joint marketing partners include other financial service companies.*



QUESTIONS?

Call (402) 891-6186 or go to www.constellationtrust.com