



# robinhood

3200 Ash St, Palo Alto, CA 94306  
support@robinhood.com

Securities offered through Robinhood Financial, LLC. Member FINRA & SIPC

*December 1, 2017 - December 31, 2017*

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ACCOUNT NUMBER **SSH-45755-10 RR DPA**

**IBRAHIM RUPAWALA**

**Your Registered Representative**  
ROBINHOOD FINANCIAL

IBRAHIM RUPAWALA  
2597 OHLONE DR  
SAN JOSE CA 95132-2631

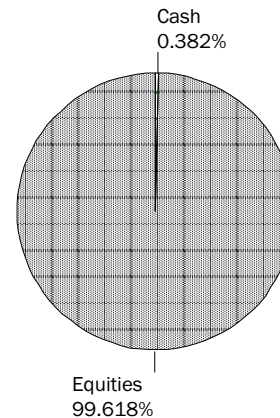
## ACCOUNT SUMMARY

	OPENING BALANCE	CLOSING BALANCE
Margin account	\$-476.04	\$61.37
NET ACCOUNT BALANCE	-476.04	61.37
Securities	14,916.04	16,023.08
TOTAL PRICED PORTFOLIO	14,916.04	16,023.08
<b>Total Equity Holdings</b>	<b>\$14,440.00</b>	<b>\$16,084.45</b>

## INCOME AND EXPENSE SUMMARY

	THIS PERIOD	YEAR TO DATE
Taxable dividends	\$0.00	\$21.25

## PORTFOLIO EQUITY ALLOCATION



ACCOUNT CARRIED BY:  
**APEX CLEARING CORPORATION**  
MEMBER FINRA, NYSE and SIPC

**See Reverse Side for Important Tax Information.** This statement shall be conclusive if not objected to in writing within ten days. Errors and omissions excepted. Please address all communications to the firm and not to individuals. Address changes or other material changes on your account should be directed to the office servicing your account. Kindly mention your account number. **This statement should be retained for income tax purposes.**

## IMPORTANT INFORMATION

You may have received a confirmation for a trade, which does not appear on this statement. If the settlement date of the trade as shown on the confirmation is later than the period ending date that appears at the top of this statement the trade will appear on your next regular monthly statement.

If this is a margin account and we maintain a special miscellaneous account for you, this is a combined statement of your general account and special miscellaneous account maintained for you under Regulation T issued by the Board of Governors of the Federal Reserve System. The permanent record of the special miscellaneous account as required by Regulation T is available for your inspection at your request.

The per annum rate of interest charged on the debit balance in your account is shown on this statement. This rate may change from time to time in accordance with fluctuations in interest rates. Interest is computed from the 16<sup>th</sup> day of the preceding month to the 15<sup>th</sup> day of the current month except in December and January. In December, the charges include the last day of the year and, in January, the interest is calculated from the first day of the month. The interest is based on the average daily net debit balance in your account with us, and for the actual number of days based on an interest year of 360 days. When calculating margin interest, free credit balances in all accounts will be offset against any debit in the margin account and the interest will be charged on the net debit balance.

We are required to report to the Internal Revenue Service all cash dividends and registered bond interest credited to your account on securities held for you in our name. We also report coupon bond interest. All dividends and interest credits should be included in your income tax return.

Information relative to commission and any other charges incurred in connection with listed option transactions occurring during the month has previously been furnished to you in confirmation of such transactions. A summary of this information will be made available to you promptly upon request. Exercise assignment notices for option contracts are allocated among customer short positions pursuant to a manual procedure with randomly selects from among all customer short option positions including those contracts which are subject to exercise. All short American style option positions are liable for assignment at any time whereas European style options are assigned at expiration. A more detailed description of our random allocation procedure is available upon request.

You are to promptly advise your brokerage firm or bank of any material changes concerning your investment objectives or financial situation.

Our financial statement is available for your personal inspection at our office, or a copy of it will be mailed upon your written request.

**SIPC Protection.** As a member of the Securities Investor Protection Corporation (SIPC), funds are available to meet customer claims up to a ceiling of \$500,000, including a maximum of \$250,000 for cash claims. For additional information regarding SIPC coverage, including a brochure, please contact SIPC at (202) 371-8300 or visit [www.sipc.org](http://www.sipc.org). Apex has purchased an additional insurance policy through a group of London Underwriters to supplement SIPC protection. This additional insurance policy becomes available to customers in the event that SIPC limits are exhausted and provides protection for securities and cash up to certain limits. Similar to SIPC protection, this additional insurance does not protect against a loss in the market value of securities.

Any free credit balance represents funds payable upon demand which, although properly accounted for on our books of records, is not segregated, and may be used in the conduct of this firm's business as permissible under the SEC Rule 15c3-2.

## NOTICE TO CUSTOMERS

Apex is a member of the New York Stock Exchange and various other exchanges. Apex acts as clearing agent for your trades.

As required under SEC rules, both the Firm's Order Routing Report as well as information regarding specific order routing information is available free of charge upon request.

Your account, which was introduced to us by your broker or bank, is established under your name on a "fully disclosed" basis at Apex. As a clearing agent, we provide securities clearance and may provide order execution on you broker's or bank's instructions.

You will remain a customer of your broker or bank. Apex will not be involved with or have any responsibility for decisions regarding securities transactions in your account. Your broker or bank will be responsible for opening, approving and monitoring all activities in connection with your account. The entry of orders, and any instructions regarding the deposit or withdrawal of securities or monies should be made through your broker or bank.

In addition to the above mentioned services, Apex will provide cashiering services, safeguarding of funds and securities while in Apex's possession, monitoring compliance with applicable credit Regulation T and Apex's internal policies, preparing and mailing your account records (including transaction confirmations and periodic statements of your account).

Interest charges to your account will be based on the size and net debit balance during the interest period. These rates are subject to revision without notice in accordance with any changes in the broker call loan rate, as published in the Wall Street Journal. For more complete information regarding interest charged to customers, consult the Truth in Lending Notice which is made available through your broker or bank.

Apex is a member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and we are required to inform you of the availability of the FINRA Investor Brochure, which contains information on FINRA BrokerCheck. You may contact FINRA at 800-289-9999 or at their website at [www.finra.org](http://www.finra.org). Apex carries your account and acts as your custodian for funds and securities deposited with us directly by you, through your brokerage firm or bank or as a result of transactions we process for your account. Any suspected inaccuracy or discrepancy in your account statement must be promptly reported to both your brokerage firm or bank (not to your individual broker or agent) and Apex. In order to protect your rights, including your right to SIPC coverage, please confirm any oral communication in writing and include your brokerage account number. General inquiries or concerns regarding your account should be directed to your brokerage firm or bank. Account positions and balance inquiries or concerns should be directed to Apex by telephone at 214-765-1009.

### ACCOUNT SUMMARY:

Displays applicable account type balance, money fund balances, priced portfolio value, and total account equity as of the opening and closing of the statement period. Priced Portfolio Value and Total Portfolio Equity are rounded to the nearest dollar. Total Priced Portfolio and Expense does not include unpriced securities.

### INCOME AND EXPENSE SUMMARY:

Lists all income earned during the current statement period, as well as year to date. Section includes taxable and non-taxable dividends and interest, capital gains and MLP (Master Limited Partnership) distributions. This section also displays and Margin Interest Expenses.

### PORTFOLIO EQUITY ALLOCATION:

The Pie Chart is an estimate for illustrative purposes only.

### PORTFOLIO SUMMARY:

Lists all securities held in your account.

### MARKET VALUE:

This amount represents the value of the security position in your portfolio based on appraisals obtained from the various quotation services. These appraisals are based on the closing prices, bond yields and/or the mean bid and ask on the last day of the statement period. Because of the nature of the data provided by the quotation services, we cannot guarantee the accuracy of such prices or the valuation dates particularly in the case of inactive or infrequently traded securities.

Some securities in your portfolio may be listed as "Unpriced" on your statement. We use an automated pricing service from an outside vendor and certain prices may not be available to them. You can obtain a current quotation, upon request, from your broker or bank.

Bond prices might differ from current market quotes. Similarly, bond ratings may differ from current actual ratings. Computerized pricing and rating services are often unable to supply us with up to the minute information. Your broker or bank will be pleased to obtain a current quotation upon request.

### ESTIMATED ANNUAL INCOME

The current annual dividend or bond interest rate for each security held, if available from quotation services. The rate is multiplied by the number of shares or par value of bonds to determine estimated annual income.

### OPEN ORDERS:

Displays all GTC (Good-Till-Cancelled) orders in your account. Also included in the section are GTX orders (GTC orders eligible for extended trading hours).

### MONEY MARKET ACTIVITY:

Purchases, reinvestments and liquidations of money market funds, plus redemptions of money market fund checks.

**DEFINITION OF ACCOUNT TYPES** C=Cash, M=Margin, I=Income, L=Legal, S=Short, X=RVP/DVP, and O=Other

### REALIZED GAIN/LOSS DETAIL AND PORTFOLIO SUMMARY SECTIONS:

Displays mutual funds by average cost and other securities by individual tax lot. Realized gains (losses) are reflected on a trade date basis for transactions settling during the current period or the period in which the shares were received, if later. Realized gains and losses may include transactions that settle during the following statement cycle. These transactions appear in the Portfolio Holdings section. Estimated unrealized gains (losses) are displayed for most securities currently held. The cost basis used in determining gains (losses) does not reflect wash sales and may not reflect all capital adjustments. Most exchanges reflected on this statement are treated as non-taxable, unless or until other information has been communicated to us. Cost basis of preferred securities with original issue discount ("OID") is not adjusted for the accretion of OID. For most long positions transferred between beneficial owners, the transferor's cost basis will be retained. For shares acquired from a decedent, you should consult your tax advisor to determine the appropriate valuations and holding period that applies. ALTHOUGH THE COST BASIS SHOWN MAY HAVE BEEN ADJUSTED, YOUR COST BASIS MAY REQUIRE ADDITIONAL ADJUSTMENTS. NOTE: WE DO NOT REPRESENT THE CALCULATIONS OF REALIZED AND UNREALIZED GAINS (LOSSES) AS AN OFFICIAL TAX ACCOUNTING OF SUCH FIGURES. FOR TAX PURPOSES, YOU SHOULD RELY ON YOUR OWN RECORDS AND THE CONSOLIDATED FORM 1099 SENT TO YOU.

### Order Routing:

The SEC requires all broker-dealers that route orders in equity securities and options to make available quarterly reports that present a general overview of their routing practices. The reports must identify the significant venues to which customer orders were routed for execution during the applicable quarter and disclose the material aspects of the broker-dealer's relationship with such venues. In addition, the Rule (SEC 606) requires broker-dealers to disclose, on customer request, the venues to which the individual customer's orders were routed for the six months prior to the request, and the execution time for the orders that were executed. For further information, please contact your broker or financial advisor.

**PLEASE RETAIN THIS STATEMENT AS IT WILL BE HELPFUL IN PREPARING YOUR INCOME TAX RETURNS AND MAY BE NEEDED ALONG WITH SUBSEQUENT STATEMENTS TO VERIFY INTEREST CHARGES IN YOUR ACCOUNT. THIS STATEMENT SHALL BE DEEMED CONCLUSIVE UNLESS OBJECTED TO IN WRITING WITHIN 10 BUSINESS DAYS OF THE STATEMENT CLOSING DATE.**

**MUTUAL FUNDS AND OTHER SECURITIES ARE NOT INSURED BY THE FDIC, ARE NOT DEPOSITS OR OBLIGATIONS OF, OR GUARANTEED BY APEX, AND INVOLVE INVESTMENT RISKS, INCLUDING THE POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED.**

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► **PORTFOLIO SUMMARY**

DESCRIPTION	SYMBOL/ CUSIP	ACCOUNT TYPE	QUANTITY	PRICE	MARKET VALUE	LAST PERIOD'S MARKET VALUE	% CHANGE	EST. ANNUAL INCOME	% OF TOTAL PORTFOLIO
<b>EQUITIES / OPTIONS</b>									
ALIBABA GROUP HOLDING LTD SPONSORED ADR	BABA	M	30	\$172.43	\$5,172.90	\$5,312.40	-3%		32.161%
COGNIZANT TECHNOLOGY SOLUTIONS CORP CL A Estimated Yield = 0.84%	CTSH	M	75	71.02	5,326.50	5,421.00	-2	45	33.116
FACEBOOK INC CL A	FB	M	8	176.46	1,411.68	1,417.44	<-1		8.777
MICRON TECHNOLOGY INC	MU	M	100	41.12	4,112.00		N/A		25.565
<b>Total Equities</b>					<b>\$16,023.08</b>			<b>\$45</b>	<b>99.618%</b>
<b>Total Cash (Net Portfolio Balance)</b>					<b>\$61.37</b>				<b>0.382%</b>
<b>TOTAL PRICED PORTFOLIO</b>					<b>\$16,084.45</b>			<b>\$45</b>	

► **ACCOUNT ACTIVITY**

TRANSACTION	DATE	ACCOUNT TYPE	DESCRIPTION	QUANTITY	PRICE	DEBIT	CREDIT
<b>BUY / SELL TRANSACTIONS</b>							
BOUGHT	12/07/17	M	DELPHI TECHNOLOGIES PLC ORDINARY SHARES SPINOFF ON 10 SHS ***DELPHI AUTOMOTIVE PLC REC 11/22/17 PAY 12/04/17 CUSIP: G2709G107	3			

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▶ ACCOUNT ACTIVITY (CONTINUED)

TRANSACTION	DATE	ACCOUNT TYPE	DESCRIPTION	QUANTITY	PRICE	DEBIT	CREDIT
<b>BUY / SELL TRANSACTIONS</b> (continued)							
BOUGHT	12/07/17	M	MICRON TECHNOLOGY INC UNSOLICITED CUSIP: 595112103	100	41.89	4,189.00	
SOLD	12/07/17	M	APPLE INC UNSOLICITED CUSIP: 037833100	10	169.68		1,696.75
SOLD	12/22/17	M	APTIV PLC UNSOLICITED CUSIP: G6095L109	10	86.031		860.28
SOLD	12/22/17	M	DELPHI TECHNOLOGIES PLC ORDINARY SHARES UNSOLICITED CUSIP: G2709G107	3	54.1901		162.55
<b>Total Buy / Sell Transactions</b>						<b>\$4,189.00</b>	<b>\$2,719.58</b>
<b>DIVIDENDS AND INTEREST</b>							
CASH-LIEU	12/14/17	M	DELPHI TECHNOLOGIES PLC ORDINARY SHARES CIL PAYMENT REC 11/22/17 PAY 12/04/17 CUSIP: G2709G107				\$16.83
<b>Total Dividends And Interest</b>							<b>\$16.83</b>
<b>FUNDS PAID AND RECEIVED</b>							
FEE	12/27/17	C	GOLD FEE 4359			\$10.00	

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► ACCOUNT ACTIVITY (CONTINUED)

TRANSACTION	DATE	ACCOUNT TYPE	DESCRIPTION	QUANTITY	PRICE	DEBIT	CREDIT
<b>FUNDS PAID AND RECEIVED</b> (continued)							
ACH	12/05/17	M	ACH DEPOSIT SEN(20171205029813)				500.00
ACH	12/05/17	M	ACH DEPOSIT SEN(20171205027283)				1,500.00
<b>Total Funds Paid And Received</b>						<b>\$10.00</b>	<b>\$2,000.00</b>
<b>MISCELLANEOUS TRANSACTIONS</b>							
NAME CHG	12/07/17	M	APTIV PLC RESULT OF NAME CHANGE CUSIP: G6095L109	10			
NAME CHG	12/07/17	M	DELPHI AUTOMOTIVE PLC SHS US LISTED NAME CHANGE @ 1:1 INTO G6095L109 CUSIP: G27823106	-10			
JOURNAL	12/28/17	M	TRANSFER BAL TO MARGIN			10.00	
JOURNAL	12/28/17	C	TRANSFER BAL FROM CASH				10.00
<b>Total Miscellaneous Transactions</b>						<b>\$10.00</b>	<b>\$10.00</b>

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## ► ANNOUNCEMENTS

### IMPORTANT INFORMATION

#### **Robinhood GOLD Customers Only: Disclosure pursuant to Exchange Act Rule 10b-16**

SEC Rules require disclosure on your statement of the total interest charge for the period during which interest is charged, dates on which the interest period began and ended, the annual rate or rates of interest charged and the interest charge for each such different annual rate of interest. As you are aware, by entering into the Robinhood Gold Agreement and opening a Robinhood Gold account, you chose to accept the bundled offering of services, which among other things includes margin lending, at a flat fee that is listed in your account statement and is based on the tiered pricing you selected and for which you qualified. You are under no obligation to borrow funds in your Robinhood Gold account. Unless otherwise indicated on your statement, your use of margin in your Robinhood Gold account will not incur any charges apart from the flat fee and no separate line item for interest charges will be identified on your statement.

### IMPORTANT INFORMATION

#### **Statement of Financial Condition**

A copy of Apex Clearing Corporation's Unaudited Statement of Financial Condition at June 30, 2017 is available on the website at [www.apexclearing.com](http://www.apexclearing.com). A copy may also be obtained at no cost by calling 1-214-765-1009. At June 30, 2017, Apex Clearing Corporation had net capital of \$132,359,707 and was \$107,139,856 in excess of its required net capital of \$25,218,851. At July 31, 2017, Apex Clearing Corporation had net capital of \$132,013,160 and was \$104,719,435 in excess of its required net capital of \$27,293,725.

### IMPORTANT INFORMATION

To our valued customers:

NASD Rule 2340 requires that we advise you to promptly report any inaccuracy or discrepancy in your account (within 10 days after available) to your brokerage firm and clearing firm (where these are different firms) and to re-confirm any oral communications in writing.

<https://www.finra.org/industry/notices/06-72>

**"IMPORTANT - Part of your distribution includes a return of capital. Any distribution that represents a return of capital reduces the estimated per share value shown on your account statement."**

The preceding notice is required when reporting distributions on Direct Participation Programs and/or REITs and is subject to the DPP or REIT sponsor's final capital return determination as detailed in the IRS Form 1099 or K-1, as applicable.

Alternative or Other Investments, DPP, and Unlisted securities are not listed on a national securities exchange, are generally illiquid and that, even if a customer is able to sell the securities, the price received may be less than the per share estimated value provided in the account. The evaluation method used for any particular DPP or REIT will be provided to clients upon request.

**Certain positions are not held on Apex's books or custodied by Apex and are not Protected by SIPC.**

Pursuant to SEC Rule 606, Apex Clearing Corporation is required to make publicly available a quarterly report with regard to its routing of non-directed orders. For the purpose of this Rule, we have entered into an agreement with Quantum5 Market Surveillance (a Division of S3 Matching Technologies) to disclose all required information pertaining to this rule. This information can be accessed on the internet at: <http://public.s3.com/rule606/apex/>, or a written copy will be furnished at no cost upon request via telephone to (214) 765-1009.

SEC Rule 606 (b) requires a broker-dealer to disclose to its customers, upon request, "the identity of the venue to which the customer's orders were routed for execution in the six months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the transactions, if any, that resulted from such orders."

In accordance with the Emergency Economic Stabilization Act of 2008 broker dealers are required to track and report cost basis to the IRS in three phases over the next three years.

- Equity securities acquired on or after January 1, 2011

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### ANNOUNCEMENTS (CONTINUED)

- Mutual fund and dividend reinvestment plan (DRIP) shares acquired on or after January 1, 2012:
  - Debit securities, options, and all other financial instruments acquired on or after January 1, 2014. (The IRS has extended this date from the previously announced date of January 1, 2013.)
- Beginning this upcoming tax reporting season the cost basis of any covered equity security transaction (purchased after 12/31/10) that is required to be reported on a 1099-B will include its associated cost basis. If you have any questions about this important change to the IRS mandated reporting requirements, please contact your broker.

### IMPORTANT INFORMATION CONTINUED

Please take note of the following description of Apex Clearing Corporation's excess SIPC coverage, which reflects certain changes made to the coverage effective August 8, 2013. The Securities Investor Protection Corporation ("SIPC") protects certain customer funds up to a ceiling of \$500,000, including a maximum of \$250,000 for cash claims. **Please note SIPC does not cover commodity contracts and options on futures.** For additional information regarding SIPC coverage, including a brochure, please contact SIPC at (202) 371-8300 or visit [www.sipc.org](http://www.sipc.org).

Apex has purchased an additional insurance policy to supplement SIPC protection. This additional insurance policy, widely known as "excess SIPC," becomes available to customers in the event that SIPC limits are exhausted. This additional insurance provides protection for securities and cash up to an aggregate limit of \$150 million, subject to sub-limits for any one customer of \$37.5 million for securities and \$900,000 for cash. Similar to SIPC protection, this additional insurance does not protect against a loss in the market value of securities. For additional information, please contact your broker.

### FDIC SWEEP PROGRAM

For customers with balances in a bank deposit account as part of the FDIC Sweep Program or shares of a money market mutual fund in which you have a beneficial interest, those balances or shares may be liquidated on your order and the proceeds returned to your account or remitted to you in accordance with the applicable prospectus and/or Terms and Conditions of the program.

For customers participating in the FDIC Sweep Program, the FDIC Sweep Program allows your cash balance to be eligible for insurance protection through the FDIC up to the maximum applicable insurance limits. Customers may obtain information about FDIC, by contacting the FDIC at 1-877-275-3342, 1-800-925-4618 (TDD) or by visiting [www.fdic.gov](http://www.fdic.gov). Deposit Account balances in the FDIC Sweep Program are not protected by SIPC or any other excess coverage by Apex Clearing Corporation. Deposit Account balances are protected as established by current applicable laws regulated by the FDIC.

Customers may obtain information about SIPC, including the SIPC brochure, by contacting SIPC at 202-371-8300 or by visiting [www.SIPC.org](http://www.SIPC.org).

### IMPORTANT INFORMATION

#### APEX CLEARING CORPORATION DISCLOSURE STATEMENT

Apex Clearing Corporation ("Apex") recognizes the importance of providing information on an ongoing basis to the customers whose accounts are cleared through Apex. Your broker/dealer has designated Apex as its clearing firm. In accordance with industry rules and regulations, Apex is required to disclose on an annual basis certain important regulatory notices and disclosures. To comply with these requirements, Apex has published an Annual Disclosure Statement which is available on the Apex corporate web site, [www.apexclearing.com](http://www.apexclearing.com). For customers who do not have access to the internet please call Apex at 214-765-1009 and request a complete copy of the Annual Disclosure Statement be mailed to your address of record.

A brief summary of the content of the Annual Disclosure Statement is as follows:

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#### ANNOUNCEMENTS (CONTINUED)

- Anti-Money Laundering - Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account.
- Privacy Policy - The privacy of customers is a responsibility which Apex respects and protects for former customers as well as current customers.
- Margin Disclosure Statement: FINRA Rule 2264 - The Information furnished provides basic facts about purchasing securities on margin and alerts customers of certain risks involved in trading securities in a margin account.
- Day-Trading Risk Disclosure Statement: FINRA Rule 2270 - Information to be considered before engaging in a day-trading strategy.
- Business Continuity Plan: FINRA Rule 4370 - A further summary of Apex's Disaster Recovery Plan to reasonable ensure business continuity.
- SEC Rule 606 and 607 (Payment for Order Flow and Order Routing information) - (Rule 606) Requires Apex to make public a quarterly report with regard to routing of non-directed orders and (Rule 607) Requires Apex to disclose its payment for order flow practices.
- SEC Rule 10b-10 - Requires customers are provided with prior written notification of certain transactions that are not reported immediately through a trade confirmation.
- SIPC Information: FINRA Rule 2266 - The Securities Investor Protection Corporation ("SIPC") requires that funds are available to meet customer claims up to a ceiling of \$500,000, including a maximum of \$250,000 for cash claims. For more information about SIPC coverage or to receive a brochure, please visit the SIPC website at [www.sipc.org](http://www.sipc.org) or, call (202) 371-8300.
- Investor Education and Protection: FINRA Rule 2267 - Requires Apex to provide information about FINRA's BrokerCheck program. The investor brochure may be obtained from FINRA BrokerCheck hotline number (800) 289-9999 or the FINRA web site address [www.FINRA.org](http://www.FINRA.org).
- Joint NASD Industry Breakpoint Task Force - A further summary of a July 2003 report which recommends written disclosure regarding mutual fund breakpoints.
- Carrying Agreements: FINRA Rule 4311 - The firm with which you have opened your securities account has retained Apex to provide certain record keeping, clearance, and settlement functions. A further summary of details is disclosed.
- Extended Hours Trading Risk Disclosure: FINRA Rule 2265 - Risks to consider include lower liquidity, higher volatility, changing prices, unlinked markets, news announcements, wider spreads, and lack of calculation.
- Liens and Levies - Apex will abide by the directions of federal, state, or other levying authorities.
- Regulation E - Disclosure regarding certain electronic transfers is required under the provisions of this regulation as issued by the Board of Governors of the Federal Reserve System.

#### IMPORTANT INFORMATION - Privacy Policy

Apex Clearing Corporation ("Apex") carries your account as a clearing broker by arrangement with your broker/dealer as introducing broker. At Apex, we understand that privacy is an important issue for customers of our introducing firms. It is our policy to respect the privacy of all accounts that we maintain as clearing broker and to protect the security and confidentiality of non-public personal information relating to those accounts. Please note that this policy applies to former customers as well as current customers.

##### Personal Information Collected

In order to service your account as clearing broker, information is provided to Apex by your introducing broker who collects information from you in order to provide the financial services that you have requested. The information collected by your introducing broker and provided to Apex may come from the following sources:

- Information received from you, such as your name, address, telephone number, social security number, occupation, and income;
- Information relating to your transactions, including account balances, positions, and activity;
- Information which may be received from customer reporting agencies, such as credit bureau reports;
- Information relating to your creditworthiness;
- Information which may be received from other sources with your consent or with the consent of your introducing broker.

##### Sharing of Nonpublic Personal Information

Apex does not disclose nonpublic personal information relating to current or former customers of introducing brokers to any third parties, except as required or permitted by law, including but



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#### ANNOUNCEMENTS (CONTINUED)

not limited to any obligations of Apex under the USA PATRIOT Act, and in order to facilitate the clearing of customer transactions in the ordinary course of business.

Apex has multiple affiliates and relationships with third party companies. Examples of these companies include financial and non-financial companies that perform services such as data processing and companies that perform securities executions on your behalf. We may share information among our affiliates, as permitted by law, in order to better service your financial needs.

##### **Security**

Apex strives to ensure that our systems are secure and that they meet industry standards. We seek to protect non-public personal information that is provided to Apex by your introducing broker by implementing physical and electronic safeguards. Where we believe appropriate, we employ firewalls, encryption technology, user authentication systems (i.e. passwords and personal identification numbers) and access control mechanisms to control access to systems and data. Apex endeavors to ensure that third party service providers who may have access to non-public personal information are following appropriate standards of security and confidentiality. We instruct our employees to use strict standards of care in handling the personal financial information of customers. As a general policy our staff will not discuss or disclose information regarding an account except with authorized personnel of your introducing broker or as required by law or pursuant to regulatory request and/or authority.

##### **Access to Your Information**

You may access your account information through a variety of media offered by your introducing broker and Apex (i.e. statements or online services). Please contact your introducing broker if you require any additional information.

#### **IMPORTANT INFORMATION - Privacy Policy - CONTINUED**

Apex may use "cookies" in order to provide better service, to facilitate its customers' use of the website, to track usage of the website, and to address security hazards. A cookie is a small piece of information that a website stores on a personal computer, and which in case later retrieve.

Changes to Apex's Privacy Policy

Apex reserves the right to make changes to this policy.

How to Get in Touch with Apex about this Privacy Policy

For more information relating to Apex's privacy policy and additional disclosures, please visit our website at [www.apexclearing.com](http://www.apexclearing.com) or contact:

Apex Clearing Corporation, Attn: Compliance Department, 350 N. St. Paul, Suite 1300, Dallas, Texas 75201, 214-765-1055