

At Foothill Securities, Inc. We Respect Your Privacy

This privacy notice is being sent on behalf of Foothill Securities, Inc. and its registered representatives (collectively called Foothill).

We recognize our obligation to keep information about you secure and confidential. It's important for you to know that we do not sell your information to anyone. We restrict access to non-public personal information about you to those representatives and employees who need to know that information to provide products or services to you. We also maintain physical, electronic, and procedural safeguards to guard your non-public personal information. This notice describes how we handle your financial information that we collect while conducting our business.

We collect information about you (such as your name, address, social security number, assets and income) from our discussions with you, and from documents that you may deliver to us in the course of providing services to you. We may use this information to open an account for you or to process a transaction for your account. In order to service your account and effect your transactions, we may provide your personal information to firms (such as a mutual fund company or custodial broker-dealer) that assist us in servicing your account and have a need for such information, as permitted by law. We may also disclose such information to FINRA or the Securities & Exchange Commission, the regulatory agencies that oversee our activities.

Some of Foothill's representatives independently provide insurance, tax preparation, advisory and other services to you. All of the information that Foothill collects through its representatives who are also employed in other non-affiliated businesses will be available to them in those other non-affiliated business capacities. Representatives will not disclose the information if you notify us that you do not want the information used in any capacity other than the one in which you have dealt with the representative.

If you prefer that we not disclose non-public, personal information about you to non-affiliated third parties, (other than those disclosures permitted by law) or to Foothill Representatives for use in their other non-affiliated businesses, you may opt out of those disclosures that is, you may direct us not to make those disclosures. If you wish to opt out of disclosures to non affiliated third parties, you may write to the following address:

Foothill Securities, Inc.
820 Bay Ave, Suite 111
Capitola, CA 95010

Disaster Preparedness/Business Continuity Plan

Foothill Securities, Inc. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do you should call our alternative number 831-462-3238 or access the following web address www.froshmanfinancial.com.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Code of Ethics

Foothill Securities, Inc., a securities broker-dealer is also registered as an investment advisor with the Securities & Exchange Commission ("SEC"). The SEC requires us to maintain records and adopt policies and procedures reasonably necessary to prevent violations of the Investment Advisor's Act of 1940 and other applicable federal rules and regulations. The Code of Ethics is intended to assist our firm in maintaining such records and disseminate to our Advisors our policies and procedures and to state our broader policies regarding Foothill's commitment to its clients. If you would like to receive a copy of the Foothill Code of Ethics, please contact our office.

Brochure Rule

The SEC requires that all investment advisors offer in writing, and on an annual basis, a brochure or equivalent document that describes the services that investment advisors provide to clients. A description of our services is contained in form ADV, Part II and schedule F. This disclosure was given to you upon the opening of your investment advisor account. If you would like to receive a copy of Foothill's current form ADV Part II and schedule F, please contact our office.