



SW FINANCIAL

## **SW FINANCIAL**

### Notice of Privacy

This privacy notice complies with the Gramm-Leach-Bliley Act and federal regulations governing the privacy of financial information applicable to our clients.

#### **SW Financial Notice of Privacy:**

We are committed to providing our clients with quality service. While collecting information about you is essential to meet your needs, we recognize the importance of handling your personal information with care. Accordingly, we have established this Notice of Privacy and related policies.

#### **Confidentiality and Security of Your Information:**

We maintain appropriate physical, electronic, and procedural safeguards to protect the security and confidentiality of your nonpublic personal information. We educate our employees about the terms of this Notice and the importance of customer privacy. We restrict access to nonpublic personal information about you to those employees and others who need to know that information to provide services to you, to maintain your accounts, or conduct our business.

#### **Information We Collect About You:**

Collecting information from you is essential to our ability to offer quality services. As part of that process, we may collect nonpublic information about you from the following sources:

- Information we receive from you on applications and other forms;
- Information about your transactions with us;
- Based upon the services provided, information we receive from consumer reporting agencies, government agencies and from your agent banks and prime brokers where applicable; and
- Information that is used to facilitate emails from you.

#### **Categories of Information We Disclose and to Whom:**

We do not disclose any information about our clients or former clients to anyone, except as permitted or required by law. We may disclose the types of information listed below to companies that help us conduct our business, that perform administrative or others services on our behalf, or other financial institutions with which we now or may have joint marketing agreements:

- Information we receive from you on applications and other forms, such as your name, address, Social Security number (if an individual), assets, income and beneficiaries;
- Information about your transactions with us, or others; and
- Information we receive from a consumer reporting agency, government agencies and from your agent banks and prime brokers where applicable, and from other sources, such as information concerning credit worthiness and history, and certain information requested pursuant to US Patriot Act anti-money laundering prevention rules and regulations.

However, our clients or former clients do have the right to opt out of the disclosure of nonpublic personal information to all nonaffiliated third parties. In any case, registered representatives who depart from employment with our Firm are prohibited from taking any information regarding any client with them.

#### **Customer Opt-Out Provision:**

If you wish to exercise your right to opt-out of information sharing of any kind please forward this document along with your name and account information to:

SW Financial  
1295 Walt Whitman Road  
Suite A  
Melville, New York 11747



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## **ORDER ROUTING NOTICE**

This notice complies with Securities Exchange Commission Rule 606 governing information applicable to our clients order routing.

### **Quarterly Disclosure Report**

The Firm is required to publicly make available every quarter a report on its routing of non-directed customer orders of securities (including options) that are subject to an effective national market system plan or transaction reporting plan.

The Firm will rely on the de minimus exemption from the quarterly reporting requirement as the Firm typically routes significantly less than 500 customer orders for execution per month during a given calendar quarter. The Firm shall examine the volume of its customer orders each quarter to review that it qualifies for the exemption.

If the Firm no longer qualifies for the de minimus exemption, then the Firm shall enter into a contractual arrangement with its clearing firm, which will prepare and publish the quarterly report on behalf of the Firm. The Designated Supervisor shall review the publications from the clearing firm, such as the clearing firm's website, to ensure that the Firm's quarterly report reflects its customer order routing practice. The review shall be conducted every quarter shortly after the report is published. The Designated Supervisor shall consider the following factors and format in reviewing the report.

### **Disclosure Upon Customer Request**

Upon request, our customers may request information about where their orders were routed, and will provide order routing information for that customer for up to six months prior to the request.

Upon request from our customers, the Firm shall provide the customer a response containing the following information:

- Identity of venues to which the orders were routed for the six months prior to customer request
- Identify directed and non-directed orders
- Time of transactions, if any, that resulted from such orders

## **BUSINESS CONTINUITY PLAN SUMMARY DISCLOSURE STATEMENT**

SW Financial ("SALW"), pursuant to Financial Industry Regulatory Authority, Inc. ("FINRA") rules, has created a Business Continuity Plan, to address and guide our response to and recovery from Significant Business Disruptions ("SBDs"). Copies of this Summary Disclosure Statement shall be given to all clients at the time they open their accounts with SALW. SALW's Business Continuity Plan is subject to modification and an updated summary will be promptly sent to our clients. Alternatively, clients may obtain updated summaries by requesting a written copy by mail or fax. In all of the following scenarios, SALW plans to continue business and our planned recovery time, depending upon the time of occurrence, should not exceed 24 hours from the time of the declaration of the SBD. Staff, telephone calls, and e-mails will return to their original location upon full restoration of service.

### **Disruption to a single building or our Firm's main office**

If a disruption occurs at our main office located at 1295 Walt Whitman Road, Suite A, Melville, NY 11747, we will relocate to the nearest reasonably available, suitable office location.

### **Disruption to a business district**

If a disruption occurs in our business district affecting our main office, we will relocate to the nearest reasonably available, suitable office location outside the business district.

### **City-wide business disruption**

If a disruption occurs in our city-wide area that affects our main office, we will relocate to the nearest reasonably available, suitable office location outside the city-wide area.

### **Regional disruption**

If a regional disruption occurs that affects our main office, we will relocate to the nearest reasonably available, suitable office location outside the regional area.

SALW has also contracted with various entities to insure that sensitive information is made redundant at back-up facilities. However, due to the nature of such information we do not disclose the specific location of any back-up facilities, any proprietary information contained in our Business Continuity Plan or the parties with whom we have back-up arrangements.

Please call us should you have any questions at **(631) 482-1150**.