



Brokerage and Custody Services
 Exclusively for Independent Advisors
 Member FINRA/ SIPC/ Reg'd MSRB

9845 Erma Road, Suite 312
 San Diego, CA 92131
 Phone: (858) 530-1031
 Fax: (858) 530-1820

Portfolio Management Data Downloads

**Initial
to order**

Data Download Files—For most portfolio management programs. More than one RIA number may be combined under one user ID.	\$150 set-up fee per user ID \$100 monthly. Charged monthly in advance	
“Sterling” site—for automated downloads and some web-based services	\$500 set-up fee per user ID. \$150 monthly. Charged monthly in advance	

Portfolio Management System Name Capitect

Activity and positions are available only from the date that the data download site has been completed. Historical files are not included. Allow 2 weeks for User ID and data set up to be completed. Data files are deleted on a rolling basis after 2 weeks and are no longer available.

Data Privacy and Non-disclosure Agreement

Data Privacy. Advisor or data processor represents that it has 1) obtained all necessary client consents to obtain, store and transmit client data; and 2) adopted and implemented procedures to safeguard client information, data and records, that are reasonably designed to: (a) ensure the security and confidentiality of client records and information; (b) protect against threats or hazards to the security or integrity of client records and information; (c) protect against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client; (d) protect against unauthorized disclosure of non-public personal information to unaffiliated third parties; and (e) otherwise ensure compliance with SEC Reg. S-P and any other federal and state privacy laws or regulations that may be applicable to the access, transfer or storage of client data and information.

Non-disclosure. All books, records, information, client data, trade secrets, proprietary information, reports, data packages, client lists, marketing plans, pricing formulas, distribution methods, and any technical information such as software, documentation, designs, processes, specifications, instructions, or formulas, pertaining to the business of either party that are exchanged, sent or received in connection with the services provided by Shareholders Service Group (SSG) shall be kept confidential and shall not be voluntarily disclosed to any other person, except (a) if such information is already publicly available; (b) as may be required solely for the purpose of carrying out a party’s duties and responsibilities to the other party or by order or demand of a court or governmental or regulatory body or as required by law; (d) as may be required to be disclosed to a party’s attorneys, accountants, regulatory examiners or insurers for legitimate business purposes; or (e) with the express prior written permission of the other party.

The advisory firm or data processor below authorizes SSG to provide client data through the services requested above and hereby agrees to indemnify, defend, and hold harmless SSG and its directors, officers, employees and agents against any and all losses, fines, penalties, claims, damages, liabilities and expenses, including attorney fees, as they are incurred, arising directly or indirectly from the access, transfer or storage of client data or the use or misuse including any breach of the data. In consideration of the services provided, advisor or data processor agrees to pay fees to SSG according to the Fee Schedule above. Interest charges and a collection fee of \$25 will apply if cash is not available in the Advisor’s Master Account at the time of the charges.

Firm Name _____

Contact Name _____

Master Acct # _____

Advisor ID # _____

Contact Email _____

Telephone _____

 Authorized Signature

 Title

 Print Name

 Date