



(515) 727-6720  
FAX (515) 727-6790  
140 South 68<sup>th</sup> Street, #2200  
West Des Moines, IA 50266

May, 2016

## PRIVACY POLICY

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 **INVESTMENT ADVISORS CORP.** DOES WITH YOUR PERSONAL INFORMATION?

Investment Advisors Corp. gathers and maintains your non-public personal information as required under Federal law to assist in providing advice, services, and products to you. Protecting the privacy of customer information is one of our most fundamental responsibilities. For your investment accounts, we mirror the policies of our third-party custodians, First Clearing LLC, Schwab Institutional, Fidelity Institutional, and TD Ameritrade, Inc. This Notice summarizes our policy regarding the confidentiality and disclosure of customer information. We do not disclose Non-public Personal Information to any affiliates or nonaffiliated third parties, except under the conditions described in §§313.14 and §§313.15 of The Federal Trade Commission's Privacy Rule.

### WHAT DO WE COLLECT?

We may collect non-public personal information about you from the following sources:

Your account opening documentation, applications or other forms, which include name, address, phone number, social security number, and date of birth. It may also include your transactions with us, our affiliates and others; information from non-affiliated third parties, such as your credit history; and information for special services offered by our third-party custodians, such as bill payment requests.

### WHAT WE SHARE?

We may disclose your non-public personal information, as described above, to an affiliated third-party, including the broker-dealer. We also may disclose the above information to non-affiliated third parties to assist us in servicing your account with us, such as our custodians; to securities regulators upon request; to others pursuant to a subpoena; or as otherwise permitted by law. Even if you decide to close your account(s) or your account becomes inactive, we will continue to adhere to the privacy policies and practices.

### HOW DO WE PROTECT YOUR 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.

### WHY CAN'T YOU LIMIT ALL SHARING?

Federal law gives you the right to limit only sharing for affiliates' everyday business purposes, such as information about your creditworthiness; affiliates to market to you; and non-affiliates to market to you. To limit our sharing, you may opt-out of this policy by sending a request to the IAC Compliance Department at 140 S. 68<sup>th</sup> Street, West Des Moines, IA 50266. If you limit sharing for any account, your choices will apply to everyone on your account.

## DEFINITIONS

- Everyday Business Purposes are actions necessary by financial companies to run their business and manage customer accounts, such as processing transactions, mailing, and auditing services, providing information to credit bureaus, and responding to court orders and legal investigations.
- Non-public Personal Information is personally identifiable financial information that a customer provides to a financial institution; results from a transaction with the customer; or as otherwise obtained by the financial institution, which may include information regarding your account value and investment history.
- Affiliated Third Parties are companies related by common ownership, or affiliated by corporate control or common corporate control, with another company (e.g.; Broker Dealer Financial Services Corp., and Bankers Financial Services, LLC).
- Non-Affiliated Third Parties are companies not related by common ownership or control, either financial or nonfinancial companies, which include the custodians, mutual fund companies, and insurance companies.

## Business Continuity Plan Summary (BCP)

### Emergency Contact Persons

Our firm's two emergency contact persons are Lisa Smith, President and CEO, 515-727-6764 or [lsmith@bdfs.com](mailto:lsmith@bdfs.com) and Barbara Bennett, CCO, 515-727-6777 or [bbennett@bdfs.com](mailto:bbennett@bdfs.com). The plan is subject to modification and updated versions are posted to the firm's website [www.investmentadvisorscorp.com](http://www.investmentadvisorscorp.com). Customers may also request a written copy of the plan by mail.

### Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities. This policy will be distributed to all employees, posted on the firm's website, delivered to customers at account opening, and mailed to customers upon request.

Our plan anticipates two kinds of SBD's, internal and external. Internal SBD's affect only our main West Des Moines office's ability to communicate and do business, such as a fire in our building. External SBD's prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a tornado, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our third-party custodians. The firm's intent is to stay in business and in light of either an internal or an external SBD, which the firm expected to last longer than eight (8) hours, would as promptly as possible under the circumstances, relocate key employees to an alternative work site to continue business functions. If it is determined that the firm cannot recover and stay in business, customers are directed to their account Custodian for access to their funds and securities.

First Clearing LLC, (877) 496-3223, or [customerservice@firstclearing.com](mailto:customerservice@firstclearing.com)  
Schwab Institutional, (800) 435-4000, or use secure email inside your account login page  
Fidelity Institutional (800) 343-3548, or log into [Fidelity.com](http://Fidelity.com) to send an email  
TD Ameritrade, Inc., (800) 669-3900, or log into [TDAmeritrade.com](http://TDAmeritrade.com) to send an email

For customer assets held outside of these named custodians, such as other third-party custodians, direct mutual funds and insurance policies, please refer to your individual statements for their direct contact information.

Investment Advisors Corp. and our custodian partners, have back-up facilities off-site, which are tested and secure. In the event the locations are activated, the firm will communicate to our clients via a phone message on the firm's answering machine, email, fax, and/or post a notice on the firm website or by whatever means available, of the change and remind customers of their access capabilities. The firm has also made contingent back up plans for power, phone, internet, and banking services to avoid any unnecessary delays in evoking the plan.

**PLEASE DIRECT ANY QUESTIONS ABOUT THIS NOTICE TO YOUR INVESTMENT ADVISOR REPRESENTATIVE.**