

FACTS WHAT DOES USA FINANCIAL DO WITH YOUR PERSONAL INFORMATION?

WHY?

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?

The types of personal information we collect and share depend on the products or services you have with us. This information can include:

- **SOCIAL SECURITY NUMBER, NET WORTH, AND INCOME**
- **ACCOUNT BALANCES AND TRANSACTION HISTORY**
- **ACCOUNT NUMBERS AND CREDIT SCORES**

When you are no longer our customer, we continue to share your information as described in this notice.

HOW?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons **USA Financial Exchange** chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does USA Financial Exchange share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes- to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A - We don't share
For our affiliates' everyday business purposes- information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes information about your creditworthiness	No	N/A - We don't share
For our affiliates to market to you	No	N/A - We don't share
For nonaffiliates to market to you	No	N/A - We don't share

PRIVACY NOTICE

QUESTIONS

WHO WE ARE

Who is providing this notice?	USA Financial Exchange
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WHAT WE DO

<p>How does USA Financial Exchange protect my personal information?</p>	<p>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.</p> <p>Additionally, our employees are trained on how to properly handle personal, non-public information. Any individual requesting non-personal, confidential information is required to verify his/her identify before any information is discussed or released.</p>
<p>How does USA Financial Exchange collect my personal information?</p>	<p>We collect your personal information (typically via new account or existing account documents), for example, when you:</p> <ul style="list-style-type: none"> ■ open an account or deposit funds ■ engage in securities transactions or request investment advice <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies. USA Financial Exchange needs the information to process and service your account and to comply with regulatory rules and requirements related to suitability and supervision.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes-information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<p>How does USA Financial Exchange safeguard checks submitted with my account applications?</p>	<p>USA Financial Exchange strives to process transactions the same day they are received. However, if the paperwork is not in good order or additional follow-up/documentation is required, our home office is permitted to hold the paperwork and any checks for up to seven business days after a complete and correct application has been received, in order to comply with regulatory suitability-review requirements. During this time, your file (new account application, product application, checks, etc.) will be locked in a secure cabinet to ensure unauthorized individuals cannot access your personal information. Once the transaction is approved by a firm principal, it will be processed accordingly and any checks submitted with the business will be sent to the issuer or product company.</p>

DEFINITIONS

<p style="text-align: center;">Affiliates</p>	<p>Affiliates are companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ USA Financial Exchange is affiliated with all companies owned by USA Financial Corporation (e.g., USA Financial Securities, USA Financial Portformulas, USA Financial Insurance Services, and USA Financial Media).
<p style="text-align: center;">Nonaffiliates</p>	<p>Nonaffiliates are companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ Nonaffiliates USA Financial shares with may include other companies in the financial services industry that your financial professional may register with upon leaving USA Financial Exchange. This can also include affiliated and non-affiliated representatives who purchase your financial professional's business. If you opt-out of this sharing, your current financial adviser's ability to service your account will be restricted.
<p style="text-align: center;">Joint Marketing</p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ USA Financial Exchange does not engage in joint marketing ventures.

OTHER IMPORTANT INFORMATION

If you live in Alaska, California, Louisiana, Massachusetts, North Dakota, or Vermont, under certain circumstances, we are required as a financial institution to obtain your affirmative consent to share your personal information with a non-affiliate. If you live in any state other than those listed, under certain circumstances, you may opt-out of USA Financial Exchange sharing your personal information with a non-affiliate. Whether you opt in or out, you will continue to receive annual privacy notices as required by the SEC. However, you do not need to respond to maintain a previous opt-in or opt-out designation.

ANNUAL FIRM BROCHURE OFFER

USA Financial Exchange's Firm Brochure (which was provided to you when you opened an account with our firm) discloses important information regarding our firm's business practices. Pursuant to SEC rules, we are obligated to offer our clients a copy of our Form ADV, annually. If you are interested in receiving a copy of our Firm Brochure, we will provide one to you, upon written request to the following address: USA Financial Exchange, 6020 East Fulton Street, Ada, MI 49301. You may also call the compliance department at (800) 869-5994.

USA Financial Exchange published its annual ADV update on April 3, 2020 and made a number of material changes to our previously filed ADV. Most importantly, due to pricing changes at our custodian, USA Financial Exchange was forced to revise our pricing structure. We also began working with JUST Capital and Value Line to create investment models. For more information regarding these ADV changes and our firm please visit the Investment Adviser Public Disclosure ("IAPD") System (www.adviserinfo.sec.gov).

Please also note that our parent company, USA Financial Corporation, applied for and received a business support loan as part of the government's Paycheck Protection Program ("PPP"), implemented in response to the COVID-19 crisis.