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**Polar Investment Counsel Inc.**

Member: FINRA, NFA, MSRB, SIPC  
Securities Cleared: Hilltop Securities Inc.  
Member NYSE, FINRA, SIPC

## **Non-Clearing Firm Account – Held Away Account Privacy Policy**

Dear Client;

While information is the cornerstone of our ability to provide superior service, our most important asset is our customer's trust. Keeping customer information secure and using it only as our customers would want us to, is a top priority. Our plain English Privacy Policy is now included in our PICI Customer Information Brochure.

The above item can be found on our website at [www.polarinvest1.com](http://www.polarinvest1.com). If you do not have web access and would like a printed copy of this information, please contact us.

Thank you,

Polar Investment Counsel, Inc.

Registered Representative