



Information regarding your account.  
Please retain for your records.

## *BUSINESS CONTINUITY PLAN*

Umpqua Investments maintains a Business Continuity Plan to address major interruptions to our normal course of business. These plans are reviewed annually and updated as necessary. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. Our plans outline the actions Umpqua Investments will take in the event of a building, city-wide, or regional incident.

### **Contacting Us:**

During a significant business disruption, Umpqua Investments will re-establish telephone service with our clients as soon as possible. Our clients should check our website at [www.umpquainvestments.com](http://www.umpquainvestments.com) for our latest information. In an emergency please call Umpqua investments at 800-452-1929 for assistance.

As a client of Umpqua Investments we recognize you may need access to your account to sell a position or request a check before we re-establish telephone service. During this time, First Clearing, our clearing firm, will assist you with sell/liquidation orders and provide check disbursements if needed. If our firm has declared an emergency and you cannot contact us, please call First Clearing for assistance at 877-496-3223.

**Our Business Continuity Plan:** We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our clearing firm, First Clearing, regularly backs up its important information in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, First Clearing has a thorough Business Continuation Plan in place. First Clearing has advised us that its objective is to restore its own operations in order to complete existing transactions and accept new transactions and payments in a timely manner.

**Varying Disruptions:** Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within twelve hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business in a timely manner. In either situation, we plan to continue in business and notify you through our website, [www.umpquainvestments.com](http://www.umpquainvestments.com), or have emergency information available via our toll-free number, 1-800-452-1929, with instructions on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

**For more information:** If you have questions about our business continuity planning, you can contact us at 1-800-452-1929 or at [www.umpquainvestments.com](http://www.umpquainvestments.com).

## *PRIVACY POLICY*

Umpqua Investments considers the privacy of its customers to be of fundamental importance and has established a policy to maintain the privacy of the information that you share with us.

Umpqua Investments does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with Umpqua Investments, including those that provide professional, legal or accounting advice to Umpqua Investments. Non-affiliated companies that assist Umpqua Investments in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that Umpqua Investments dictates.

We may also disclose your personal information to fulfill your instructions, to protect our rights and interests and those of our business partners or pursuant to your express consent. Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

*You should know that Umpqua Investments will not sell your personal information.*

We restrict access to your nonpublic personal information to authorized employees. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

As described in this policy, we will from time to time share personal information with affiliated companies. If you would like more information about our privacy policy, please write us at:

Umpqua Investments  
Compliance Dept.  
One S.W. Columbia Street, Suite 300  
Portland, Oregon 97258

Or call 1-800-452-1929 and ask to speak with the Compliance Department. Please see the following pages for further information regarding our privacy policy.



<b>FACTS</b>	<b>WHAT DOES UMPQUA INVESTMENTS, INC., DO WITH YOUR PERSONAL INFORMATION?</b>
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 product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Social Security number and income</li> <li>• account balances and payment history</li> <li>• investment history and portfolio values</li> </ul> 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 Umpqua Investments chooses to share; and whether you can limit this sharing.

Reasons We Can Share Your Personal Information	Does Umpqua Investments 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	No	We don't share
For joint marketing with other financial companies	No	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	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share

<b>Questions</b>	Call 1-800-452-1929
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Who we are	
Who is providing this notice?	Umpqua Investments, Inc. Member FINRA/SIPC
What we do	
<b>How does Umpqua Investments protect my personal information?</b>	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.  We assess current risks to design specific safeguards that protect customer information, and have processes in place to deal with information security incidents if they occur
<b>How does Umpqua Investments collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• open an account or deposit money</li> <li>• pay for your securities transactions or request money be sent to you</li> <li>• write a check or use your credit</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.
Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Our affiliate(s) include companies with a common corporate identity of Umpqua Holdings Corporation; such as Umpqua Bank</li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Umpqua Investments, Inc. does not share with non-affiliates so they can market to you.</li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• Umpqua Investments, Inc. does not allow this activity.</li> </ul>
Other Important Information	
<p>You may have other privacy protections under applicable state laws including those for California and Nevada residents. To the extent the state laws apply, we will comply with them when we share information about you, and in some cases may be limited by you.</p> <p>California Residents: The California Information Privacy Act provides additional protections to control whether we share some of your personal information. In accordance with California law, we will not share information we collect about California residents with outside companies, except as permitted by law, such as with the consent of the customer or to service a customer's accounts.</p> <p>Nevada Residents: Pursuant to Nevada law, we are providing this notice, which applies to accounts with Nevada mailing addresses, to inform you that you may elect to be placed on our internal "do not call" list. If you would like to be placed on the list, please let us know by simply calling us at 1-800-452-1929. You may also contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Avenue, Suite 3900, Las Vegas, Nevada 89101 Telephone: (702) 486-3132 Email BCPINFO@ag.state.nv.us.</p>	