PRIVACY NOTICE

USA FINANCIAL EXCHANGE℠

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**
With other members of your household- Your account information is shared with other members of your household who also have accounts with us	**Yes**	**Yes - Please contact USA Financial at 888-407-8198**
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	**Yes**	**Yes - Please contact USA Financial at 888-407-8198**
For nonaffiliates to market to you	**No**	**N/A - We don't share**

USA Financial Exchange℠ • 6020 East Fulton St. • Ada • Michigan • 49301
Office (888) 444-0125 • Fax (888) 444-7105

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QUESTIONS

WHO WE ARE	
Who is providing this notice?	USA Financial Exchange

WHAT WE DO	
How does USA Financial Exchange protect my 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. 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.
How does USA Financial Exchange collect my personal information?	We collect your personal information (typically via new account or existing account documents), for example, when you: ■ **open an account or deposit funds** ■ **engage in securities transactions or request investment advice** 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.
Why can't I limit all sharing?	Federal law gives you the right to limit only: ■ **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** State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
How does USA Financial Exchange safeguard checks submitted with my account applications?	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.

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DEFINITIONS

Affiliates	Affiliates are companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Nonaffiliates are companies not related by common ownership or control. They can be financial and nonfinancial companies. ■ **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.**
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

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 888-444-0125.

USA Financial Exchange published its latest update on April 27, 2026. Included in this update was:

- Item 4 - Advisory Business: USAFEX has added new information regarding the availability of J.P. Morgan Asset Management (JPMAM) model portfolios and the 55ip Direct Indexing program on the USAFEX platform.
- Item 5 - Fees and Compensation: Fee information, billing methodology, and platform minimums applicable to the newly added JPMAM and 55ip Direct Indexing offerings have been added and clarified.
- Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss: Additional disclosures have been included describing the investment methodologies, operational processes, and associated risks for JPMAM strategies and the 55ip direct indexing program.
- Item 10 - Other Financial Industry Activities and Affiliations: New disclosures have been added regarding:
  - The Growth Keeper Program, including conflicts of interest related to production based incentives and Signature Strategies; and
  - The Signature Strategies section on the USAFEX platform, including potential revenue based conflicts.
  - The TruChoice referral and distribution relationship, describing affiliated entity compensation arrangements and associated conflicts of interest.

For more information regarding these ADV changes and our firm please visit the Investment Adviser Public Disclosure ("IAPD") System (www.adviserinfo.sec.gov). Additional disclosures can be found on our website at www.usafinancialexchange.com/reg-bi/.