

European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how National Securities Corporation; National Asset Management, Inc., National Insurance Corporation (together “National” “we,” or “our”) treat personal data of individuals in the European Union). The information in this Notice is provided pursuant to the European Union’s General Data Protection Regulation (GDPR) and is in addition to other privacy notices we may provide.

The authorized representative of National in the European Union is activeMind.legal. You may also contact National at privacyofficer@nhldcorp.com. Contacting National through other means could impact your rights and National’s obligations under the GDPR.

Basis for and Purposes of Data Processing

We collect and process your personal data in order to provide services to you and perform our obligations under our contract with you. You are required to provide personal data to enter into a contract with us, and we are required to obtain certain personal data in order to comply with applicable regulations. If we do not receive the information that we request, we may not be able to provide the requested services.

Depending on the services you subscribe to, your contract is with one or more of the following National companies identified in your contracts and account materials:

- National Securities Corporation provides investment services and products, including brokerage accounts.
- National Insurance Inc., provides insurance related services and products.
- National Asset Management, Inc. provides investment advisory services.

We also collect and process your personal data in order to comply with applicable U.S. laws. The basis for such processing is our legitimate interests, as we could not provide you with the required contractual services unless we complied with U.S. laws. We do not collect sensitive personal data under GDPR (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership). Please do not send us any such sensitive information.

Personal Data Not Obtained From You

We obtain personal information about you from other sources, including those publicly accessible, and use that information to assist us in verifying your identity and for other purposes described in this notice.

Recipients of Personal Data

We share your personal data with unaffiliated service providers in connection with the performance of our contract with you. Our service providers provide services such as: (a) professional, audit, accounting, and tax services; (b) network and trading platforms; (c) clearing and settlement (d) record retention, (e) administrative services, such as printing and mailing; (f) deal transaction participants and (g) legal, governmental, and regulatory support. Some of your personal data may be processed outside of the European Economic Area.

Disclosures of your personal data which we make to our third party service providers will be made subject to conditions of confidentiality and security as we may consider appropriate to the specific circumstances of each disclosure. We also share your personal data with affiliated companies, and with third parties other than service providers, including regulatory authorities and law enforcement agencies, consumer reporting agencies, in connection with litigation, in the event of a reorganization, acquisition, disposition or similar transaction, and in other events where it is permitted by law or where we have your consent.

International Transfers

The National companies listed above are based in the U.S. (a country for which the EEA has not issued an adequacy decision on the protection of personal data). We may transmit data to you and vice versa as necessary for the performance of our contract with you.

Data Storage Period

We will retain personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you and provide the services; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Your GDPR Rights

You can exercise or address these rights (subject to retention and other requirements under applicable law) by contacting us or our representative as provided in the beginning of this Notice.

1. Access. You have the right to obtain access to your personal data.
2. Rectification. You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
3. Erasure. You have the right to request that personal data be erased. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.
4. Restriction on processing. You have the right to request the restriction of the processing of your personal data in specific cases.
5. Objection to processing. You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
6. Portability. You have the right to receive your personal data in a machine-readable format and send it to another controller.
7. Lodging a complaint with a Supervisory Authority. You have the right to lodge a complaint with a Supervisory Authority within your Member State.