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## Privacy Notice

**Last Reviewed:** 10/10/2023

[California residents: click here for notice regarding your additional rights under California Consumer Privacy Act \(CCPA\)](#)

### Introduction

Abandoned Property Advisors, LLC (“we,” “us” or “our”) is the leading unclaimed property services provider offering communication, consulting and compliance services and programs to its institutional clients and consumers. Abandoned Property Advisors, LLC is committed to using its best efforts to protect your privacy with technology that gives you the most powerful and safe online and commercial experience.

Abandoned Property Advisors, LLC is subject to the investigatory and enforcement powers of the Federal Trade Commission (“FTC”). Abandoned Property Advisors, LLC serves as a business associate for some clients, which may involve the use and disclosure of an individual’s protected health information. As a business associate, Abandoned Property Advisors, LLC complies with certain laws under the Health Insurance Portability and Accountability Act and the Health Information Technology for Economic and Clinical Health Act (“HIPAA Laws”). All protected health information is handled in accordance with the privacy and security protections afforded under the HIPAA Laws. Abandoned Property Advisors, LLC’s wholly owned subsidiary, APA Securities, LLC, is a licensed broker-dealer and subject to the laws, rules and enforcement powers of the Securities and Exchange Commission (“SEC”).

With respect to data collected as a result of Abandoned Property Advisors, LLC’s solicitation to provide services in the European Economic Area (“EEA”), and/or data transferred to it by clients who obtained the data from sources within the EEA, Abandoned Property Advisors, LLC complies with the General Data Protection Regulation (“GDPR”) and the EU-US Data Privacy Framework as well as the UK Extension to the EU-US Data Privacy Framework.

This Privacy Policy includes Abandoned Property Advisors, LLC and APA Securities, LLC (collectively, “APA”) and applies to all personal information received by APA whether in electronic, paper or verbal format. This Privacy Policy also applies to the APA family of websites and governs general data collection and usage. **By using the APA website and/or engaging APA’s services, you consent to the data practices described in this Privacy Policy.**

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## GDPR

For personal information of consumers, customers, investors, and government officials that APA receives from the EEA, either directly as Data Controller or as a Data Processor for its clients, APA has committed to handling such personal information in accordance with the GDPR.

For more information about the General Data Protection Act Principles (“GDPR”), please visit the Data Protection Commissioner of Ireland’s Website: <http://www.dataprotection.ie/>.

## Purpose of Collection of your Personal Information and Legal Basis for Processing

Pursuant to the documents you may complete and provide to APA, agreements you enter into with APA, agreements you may already have in place with a financial institution or company holding your data, and/or APA’s contracts with such companies, APA collects personally identifiable information, such as your e-mail address, name, home or work address, telephone number, and/or other personally identifiable information. APA may also collect anonymous demographic information, which is not unique to you. The purpose of APA’s collection and processing of this information is to assist a company holding your property in complying with federal or state law to locate you, verify your identity, and reunite you with your property; and/or going beyond such requirements when such efforts have not reached you. In addition, APA may collect personally identifiable information about you in order to determine if you are the correct entitled party where its client holds an asset registered to you or in the name of a deceased individual. Such collection is in furtherance of the legitimate business and fraud prevention interests of APA’s clients.

There is also information about your computer hardware and software that upon your consent to the pop-up notification is automatically collected by APA’s internet optimization vendor. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used by APA for the operation of this website, to maintain the quality of this website, and to provide general statistics regarding use of the APA website.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through public comments on APA blog posts, this information may be collected and used by others.

APA encourages you to review the privacy statements of websites you choose to navigate to through a link from APA’s website so that you can understand how those websites collect, use and share your information. APA is not responsible for the privacy statements or other content on websites outside of the APA and APA family of websites.

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## Use and Storage of Your Personal Information

APA collects and uses your personal information to operate the APA website and to deliver the services you or an APA client have contracted with APA to receive. Where you provide consent pursuant to one of APA's pop-up notices, APA also uses your personally identifiable information to inform you of other products or services available from APA. APA may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

APA does not sell, rent or lease its customer lists to third parties. If this business practice changes in the future, APA will provide individuals with opt-out or opt-in (for sensitive data) choice. APA may share data with vetted third-party vendors to help us securely store and maintain data, perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to APA, and they are required to maintain the confidentiality of your information.

Upon consent pursuant to APA's pop-up notifications, APA keeps track of the websites and pages you visit within APA to determine what APA services are the most popular. This data is used to deliver customized content and advertising within APA to customers whose behavior indicates that they are interested in a particular subject area.

APA stores personal Information within the United States of America on secure, cloud-based servers, in a secure data colocation to ensure disaster recovery and business continuity, and on WORM (write once, read many) compliant, encrypted back-up tapes maintained at a secure commercial storage facility. APA maintains a ten-year data retention policy in order to accommodate various United States' jurisdictions' audit review.

APA may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. APA will disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on APA or the website; (b) protect and defend the rights or property of APA; and (c) act under exigent circumstances to protect the personal safety of users of APA or the public.

## Use of Cookies

As disclosed in the pop-up notifications provided upon your navigation to the APA websites, it uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. APA may use a vendor that provides the ability to identify you personally based on links you have clicked in emails or

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information you have submitted in online web forms and associate this information with certain cookies. APA may continue to receive information that identifies you and tracks your web page views as you view other websites that use these certain services.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of APA's services or websites you visit.

## Security of Your Personal Information

APA takes all reasonable steps to secure your personal information from unauthorized access, use or disclosure in a controlled, secure environment. When personal information is transmitted by APA, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

## Rights of Personal Data Subjects

APA acknowledges the right of individuals to access their personal data. An individual who seeks access, or who seeks to correct, amend, limit use or delete inaccurate data, should direct their query to APA at [onlinesubmissions@ap-advisors.com](mailto:onlinesubmissions@ap-advisors.com). If requested to remove data, APA will respond within a reasonable timeframe to the extent that APA controls the data and can reasonably remove the same or is required to do so.

For personal data subject to the GDPR, you have the right to: (a) transfer personal data from one electronic processing system to another; (b) know what data has been collected about you and how such data has been processed; (c) make changes to inaccurate data; (d) to the extent that our retain of your data is in reliance on your consent to process your personal data, you have the right to withdraw your consent and ask for your personal data to be deleted, note that this does not apply to data that APA must maintain in order to fulfill its contractual obligations to a property holder client.

## Changes to this Privacy Policy

APA will occasionally update this Privacy Policy to reflect company and customer feedback. APA encourages you to periodically review this Privacy Policy to be informed of how APA is protecting your information.

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## Contact Information

APA welcomes your comments regarding this Privacy Policy. If you believe that APA has not adhered to this Privacy Policy, please contact APA at [onlinesubmissions@ap-advisors.com](mailto:onlinesubmissions@ap-advisors.com). We will use commercially reasonable efforts to promptly determine and remedy the problem.

## Privacy Complaints by European Union Residents

### GDPR Complaints

In compliance with the GDPR, APA commits to resolve complaints about your privacy and our collection or use of your personal information. EU residents who were directly solicited by APA, or an APA client, for their personal information via solicitation to provide services in the EEA or the UK may lodge a complaint with a supervisory authority in the EU Member State of their residence, the EU Information Commissioner's Office (ICO), place of work, or where the alleged infringement occurred, however we request that any concerns or complaints first be directed to APA so that we have an opportunity to promptly resolve the issue. You can contact APA at:

ABANDONED PROPERTY ADVISORS, LLC  
920 Sylvan Avenue, Suite 240  
Englewood Cliffs, New Jersey 07362 USA  
Phone: 866-950-9229  
Web: [www.ap-advisors.com](http://www.ap-advisors.com)  
Email: [onlinesubmissions@ap-advisors.com](mailto:onlinesubmissions@ap-advisors.com)

## Data Privacy Framework Notice for Individuals in the EU and UK

APA complies with the EU-US Data Privacy Framework ("EU-US DPF") and the UK Extension to the EU-US DPF as set forth by the US Department of Commerce. APA has certified to the US Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles ("EU-US DPF Principles") with regard to the processing of personal data received from the EU in reliance on the EU-US DPF and from the UK (and Gibraltar) in reliance on the UK Extension to the EU-US DPF. If there is any conflict between the terms in this privacy policy and the EU-US DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework ("DPF") program, and to view our certification, please visit <http://www.dataprivacyframework.gov/>.

Pursuant to the Data Privacy Frameworks, EU and UK individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you.

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individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under the Data Privacy Frameworks, should direct their query to [onlinesubmissions@ap-advisors.com](mailto:onlinesubmissions@ap-advisors.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [onlinesubmissions@ap-advisors.com](mailto:onlinesubmissions@ap-advisors.com).

Pursuant to the EU-US DPF Principles, APA acknowledges the right of EEA and UK individuals to access their data to correct, amend or request erasure of data that has been handled in violation of the EU-US DPF Principles. We also affirm that we remain liable regarding the onward transfer of said data to third parties acting as our agents unless we can prove we were not a party to the events giving rise to the damages.

APA is subject to the regulatory and enforcement authority of the United States Federal Trade Commission ("FTC").

In compliance with the EU-US DPF and the UK Extension to the EU-US DPF, APA commits to resolve complaints about our collection or use of your personal information transferred to the US pursuant to the EU-US DPF, EU and UK individuals with inquiries or complaints should first contact APA at:

ABANDONED PROPERTY ADVISORS, LLC  
920 Sylvan Avenue, Suite 240  
Englewood Cliffs, New Jersey 07362 USA  
Phone: 866-950-9229  
Web: [www.ap-advisors.com](http://www.ap-advisors.com)  
Email: [onlinesubmissions@ap-advisors.com](mailto:onlinesubmissions@ap-advisors.com)

APA has further committed to refer unresolved DPF Principles-related complaints to a US-based independent dispute resolution mechanism, BBB National Programs Data Privacy Framework Services. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbbprograms.org/dpf-complaints](http://www.bbbprograms.org/dpf-complaints) for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf>.