



Vanclef Financial Group of  
Companies  
Vanclef Financial Group, Inc.  
VFG Securities, Inc.  
VFG Advisors, Inc.



## 2016 Privacy Policy Annual RIA—ADV Offer Customer Identification Program Requirement and Other Important Disclosures

**Please Take the Time To Review This Notice As It Applies To Your Relationship With Our Firms**

### VFG's Privacy Policy

This privacy policy applies to customers or former customers of the Vanclef Financial Group of Companies, including VFG Securities, VFG Advisors and Vanclef Financial Group, collectively "VFG", in the United States.

This notice will describe to you how we handle your confidential information, how we protect it and other important information you should know about our firm. Thank you for the trust you have placed in us. We look forward to working very hard to continue to earn your trust.

When you work with a financial services professional to develop a financial plan or purchase an insurance or investment product, you may share highly personal information about your health, assets, income, estate, business and family. The information we collect is critical to providing you the best products and services available. We recognize that protecting the privacy and security of this information is of utmost importance and one of our greatest responsibilities.

Vanclef Financial Group and its affiliated companies ("VFG") is committed to maintaining the trust and confidence of our customers. We want you to know and understand how we protect your privacy as we collect and use information about you, and the measures we take to safeguard that information. Keeping our customer's information private and secure is our top priority.

#### What type of non-public information do we collect about you?

In the course of providing service to you, we collect non-public personal information about you from the following sources:

- Account applications and other standard forms. Such information includes name, address, social security number, assets, types and amount of investments, transactions and income.
- Our affiliates or others including those companies that work closely with us to provide you with diverse financial products and services. Information collected from these sources include account balance, payment history, parties to transactions, types and amounts of investments, transactions, and credit card usage.
- Consumer reporting agencies may provide us with your credit worthiness and credit history.
- Institutions where you conduct financial transactions verify that the information you provide on applications and other forms is true and accurate.

#### How do we protect the confidentiality and security of your non-public personal information?

Keeping your information secure is one of our most important responsibilities. VFG has procedures in place that restricts access to non-public personal



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information about you only to those employees and agents who need to know the information in order to provide products or services to you. We also educate our employees about the importance of protecting the privacy and security of confidential personal information. We maintain physical, electronic, and procedural safeguards that comply with federal and state regulations to guard your non-public personal information.

### **Do we disclose non-public personal information to third party affiliates?**

We do not sell, share, or disclose your non-public personal information to non-affiliated third party marketing companies. We may disclose the information we collect, described above, to companies that perform marketing or other services on our behalf, or to other financial institutions with whom we have joint marketing agreements. All of these companies are contractually obligated to keep the information confidential and use the information only for the services required and as allowed by applicable law or regulation. These companies are not permitted to share or use information for any other purpose.

We may also disclose non-public personal information about you under special circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, to conduct our operations, to follow your instructions as you authorize, or to protect the security of our financial records.

### **What is our policy relating to former customers?**

If you decide to move your account away from VFG, we will continue to adhere to the privacy policies and practices described in this notice.

We will update our privacy policies when necessary to ensure that your privacy is maintained and that we conduct our business in a way that fulfills our commitment to you. If we make any material changes to our privacy policy we will provide our customers with an updated notice.

If you have any questions after reading this Policy, please contact our Chief Compliance Officer in writing at the address below and on the cover of this brochure.

### **Business Continuity Plan (Summary Disclosure Statement)**

We want to assure you that VFG maintains a Policy and a Plan to continue business as usual in case of a Significant Business Disruption (SBD). SBD scenarios, both internal and external, of varying severity such as a disruption to a single building, a disruption to a business district or a city-wide business disruption, are included in our Plan. VFG will execute the plan as the situation warrants. Our policy is to respond to SBDs by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming business operations, protecting the firm's books and records, and allowing our customers to transact business. We will make all reasonable efforts to resume normal operations within 24 hours, or as soon as possible. If the Internet is accessible, we will provide instructions and information on how to contact us or access your account directly from our website in the case of a SBD. VFG reserves the right to make modifications to the plan without notification.



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As our client, you may receive a summary by going to our website ([www.vfgroup.net](http://www.vfgroup.net)) or by requesting a written copy by mail from:

**Vanclef Financial Group of Companies**  
Compliance Department  
100 Corporate Pointe, Suite 382  
Culver City, CA 90230  
[www.vfgroup.net](http://www.vfgroup.net)

*We invite you to visit our website for all disclosure notices and additional information on our Firm.*

### Anti-Money Laundering Customer Notice

#### **The USA PATRIOT ACT**

The USA Patriot Act signed by President Bush in October 2001 imposed anti-money laundering requirements on brokerage firms and other financial institutions. By April 24, 2002, all brokerage firms were required to have a comprehensive anti-money laundering program in place.

#### **WHAT IS MONEY LAUNDERING?**

Money laundering is the process of creating the appearance that large amounts of money obtained from serious crimes such as drug trafficking, originated from a legitimate source. Not only does it occur in drug related incidents but in connection with a wide variety of crimes including fraud, illegal arms sales, racketeering, robbery and terrorism.

#### **HOW BIG IS THE PROBLEM AND WHY IS IT IMPORTANT?**

The use of the U.S. financial system by criminals to facilitate terrorism and/or other crimes could well taint our financial markets. According to the U.S. State Department, a recent estimate put the amount of worldwide money laundering activity over \$1 trillion per year.

#### **WHAT ARE WE REQUIRED TO DO TO COMBAT MONEY LAUNDERING?**

Under rules required by the USA Patriot Act, our Anti-Money Laundering program must designate a special compliance officer, conduct employee training, conduct independent audits, positively verify customer's identities, and establish policies and procedures designed to detect and report suspicious transactions and ensure compliance with the new laws.

As part of these requirements, we will be asking you to provide various unexpired government-issued photo identification, or other information. Until you provide the documents or information we need, we will not be able to open an account or effect any transactions for you. If you have an existing account, it may be closed until your identification can be positively verified.

We thank you for your patience and hope you will support our efforts to deny terrorist groups access to America's financial system.



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### **Investment Adviser Public Disclosure (IAPD):**

For assistance with checking the background of a representative you can call the Public Disclosure Hotline at (800) 289-9999 or visit [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or [www.finra.org](http://www.finra.org) and click on “Investors.”. The investor brochure including information about the Public Disclosure Program can be found on this website. This site allows you to search for an individual investment adviser-registered representative and also to find out about an investment adviser firm, whether it is properly registered, and provides access to its registration form, called "Form ADV Part 2A."

### **SEC Investor Web Site:**

The SEC's Office of Investor Education and Advocacy provides a variety of services and tools to address questions you may face as an investor. The SEC has dedicated this website to investors: <http://www.investor.gov>.

### **Annual Offer of Form ADV 2A “Brochure”**

Annually, VFG Advisors is required to offer to deliver to each of its investment advisory clients, upon written request, its Form ADV Brochure (ADV Part 2A). Clients who would like to receive a copy of this document should send a written request to us at the address below.

### **Questions or Complaints:**

If you have questions or complaints about the services provided by VFG or associated persons representing VFG, please contact our Compliance Department at [compliance@vfgroup.net](mailto:compliance@vfgroup.net), or at the number and/or address below.

Please contact our Compliance Department if you need further information after reading our Policies and other Firm Disclosures.