



Investment Services™

FACTS WHAT DOES ESL INVESTMENT SERVICES, LLC 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 product or service you have with us. This information can include:

- Social Security number
- Income
- Assets
- Investment experience
- Account transactions
- Retirement assets

If you terminate your account with us, we will not share information we have collected about you, except as required by law.

How? All financial companies need to share customer’s personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer’s personal information; the reasons ESL Investment Services, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ESL Investment Services, LLC 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	Yes	Yes
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes - information about your transactions and experiences	Yes	Yes
For our affiliates’ everyday business purposes - information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We do not share

To limit our sharing

- Call 585.336.1000 or 800.848.2265;
- Mail the form below; **or**
- Visit your local branch

Please Note:
If you are a *new* customer, we can begin sharing your information 30 days from the date we sent you this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.
However, you can contact us at any time to limit our sharing.

Questions? Call ESL Investment Services, LLC at 585.339.4475 or 800.814.5884.

ESL Investment Services, LLC Mail-in Form

Mark any/all you want to limit:

Do not use my personal information to market to me.

Do not share information about my transactions and experiences with your affiliates for their everyday business purposes.

Do not allow your affiliates to use my personal information to market to me.

Name		Mail to: ESL Federal Credit Union Attn: Deposit Operations P.O. Box 23017 Rochester, NY 14692
Address		
City, State, Zip		

Who we are

Who is providing this notice?	ESL Investment Services, LLC
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What we do

How does ESL Investment Services, LLC protect my personal information?	<p>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.</p> <p>To protect your privacy, we only work with companies that agree to maintain strong confidentiality protections and limit use of information we provide.</p> <p>We restrict access to nonpublic personal information about you to those employees who have a specific business reason to use your data. Our employees are trained to appreciate the importance of maintaining confidentiality and customer privacy. We maintain physical, electronic and procedural safeguards that comply with federal regulations and leading industry practices to safeguard your nonpublic personal information.</p>
How does ESL Investment Services, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account • Apply for insurance • Show your government-issued ID • Provide new account documentation, investment applications and other forms • Perform transactions with us, or our affiliates, or others • Seek advice about your investments <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes • Affiliates from using your information to market to you • Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial or nonfinancial companies. Our affiliates include financial companies such as ESL Federal Credit Union, ESL Trust Services, LLC and Cooper/Haims Advisors, LLC.
Nonaffiliates	Companies not related by common ownership or control. They can be financial or nonfinancial companies. <i>ESL Investment Services, LLC does not share with nonaffiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>ESL Investment Services, LLC only jointly markets with Affiliates</i>

Other important information

Securities Investor Protection Corporation (SIPC) information, including the SIPC brochure, may be obtained by phone, email or regular mail at 1667 K. St. N.W., Suite 1000, Washington, D.C. 20006-1620, tel: 202.371.8300, fax: 202.223.1679, email: asksipc@sipc.org. You may also visit their website at www.sipc.org.

We appreciate your business and look forward to serving your financial needs for many years to come.

ESL Investment Services, LLC, member [FINRA/SIPC](#), is a subsidiary of ESL Federal Credit Union.
 ESL Investment Services, LLC and ESL Federal Credit Union are not insurance companies or insurance underwriters.

NOT INSURED BY NCUA OR ANY OTHER GOVERNMENT AGENCY	NOT CREDIT UNION GUARANTEED	NOT CREDIT UNION DEPOSITS OR OBLIGATIONS	MAY LOSE VALUE
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