## TRADITION SECURITIES & DERIVATIVES, INC. DISCLOSURES

# Tradition Securities & Derivatives, Inc.. Business Continuity Plan Summary and Disclosure Statement

Tradition Securities & Derivatives, Inc.. intends to offer service to customers as quickly and efficiently as possible after a business disruption event. Summarized below is our intended response to disruptions of various scopes:

- 1) Disruptions to our offices at 255 Greenwich Street, and 32 Old Slip, New York, the New York City Financial District or New York City outside the scope of usual phone / communications disruptions: The Connecticut Branch of Tradition Securities & Derivatives, Inc.. will be activated. Customers will be contacted either by phone or electronic media such as e-mail or approved Instant Messaging services using back-up contact lists stored individually by the brokers or electronically by the IT Department. Alternatively, customers may contact TSD at (203) 351-9557 or via e-mail at <a href="equity@tradition.com">equity@tradition.com</a>. TSD should be able to provide service to customers using telephone and electronic medium, assuming OTC financial markets and / or exchanges and are unaffected by the disruption, between 24 and 48 hours of the disruption.
- 2) Regional Disruption: TSD will attempt to resume business as quickly as practical either at the TSD New York office or at the firm's branch in Stamford, CT. TSD will attempt to provide customers with status reports on <a href="https://www.tradition.com">www.tradition.com</a>. TSD should be able to provide service to customers using telephone and electronic medium from either of these sites, assuming OTC financial markets and / or exchanges and are operating, concurrently with the ending of the regional disruption.
- 3) Summary of TSD Emergency Contact Information: Website: <a href="www.tradition.com">www.tradition.com</a> Phone #'s: New York 1 (212) 943 8700, Stamford, CT back-up phone # 1 (203) 351 1594. E-mail contact addresses: <a href="mailto:equity@tradition.com">equity@tradition.com</a>, <a href="mailto:joshua.wietschner@tradition.com">joshua.wietschner@tradition.com</a>, <a href="joshua.wietschner@tradition.com">jeff.mehan@tradition.com</a>.

# ISE SOLICITED ORDER MECHANISM NOTIFICATION

When handling an order of 500 contracts or more on your behalf, Tradition Securities & Derivatives, Inc. may solicit other parties to execute against your order and may thereafter execute your order using the International Securities Exchange's Solicited Order Mechanism. This functionality provides a single-price execution only, so that your entire order may receive a better price after being exposed to the Exchange's participants, but will not receive partial price improvement. For further details on the operation of this Mechanism, please refer to International Securities Exchange Rule 716, which is available at <a href="https://www.ise.com">www.ise.com</a> under "Membership, Rules & Fees – Regulatory – ISE Rules."

### **PAYMENT FOR ORDER FLOW**

TSD, in an effort to seek best execution, routes customer orders to national securities exchanges, alternative trading systems (ATSs), including electronic communications networks (ECNs), and other market centers. TSD may accept payment for order flow. Further information about the source and nature of payments for order flow received by TSD will be provided upon your written request to TSD's Compliance Department, 255 Greenwich Street, 4th floor, New York, NY 10007

# **PRIVACY**

Your Privacy Is Important To Tradition Securities & Derivatives, Inc..

## **Privacy Statement**

We are committed to protecting our customers' personal and financial information. In the course of providing you with financial products and services, we need to collect and maintain certain nonpublic personal information about you. This Privacy Statement answers some questions about what nonpublic personal information we collect, what we do with it, and how we protect it.

We do not sell your personal information to anyone.

We collect nonpublic information about you from the following sources:

- Information we receive from you on applications or other forms.
- Information about your transactions with Tradition Securities & Derivatives, Inc...

We do not disclose any nonpublic information about you or former customers to anyone other than affiliates, except as permitted or required by law. For example, this may include providing information to companies that perform support services on our behalf or to providing tax information to regulators or the IRS.

We restrict access to your nonpublic information to those employees who need to know that information to provide products or services to you.

We maintain physical, electronic, and procedural safeguards to protect nonpublic personal information.

#### **Disclosure of Order Routing Information:**

Tradition Securities & Derivatives, Inc. relies on the Small Firm Exemption for disclosure of order routing information. Information regarding routing of specific customer orders is available upon request from Tradition Securities & Derivatives, Inc.'s Compliance Department, 255 Greenwich Street, 4th floor, New York, NY 10007."

## Securities Investor Protection Corp ("SIPC")

In accordance with FINRA Rule 2266, please be advised you may obtain information about SIPC including the SIPC brochure by contacting SIPC at <a href="https://www.sipc.org">www.sipc.org</a> or 202-371-8300.

#### Identity Verification for Anti - Money Laundering Purposes

We are required by Federal Law to verify the identity of each account owner. TSD may request that you provide various identification documents prior to opening an account.

### **FINRA Public Disclosure**

The FINRA Public Disclosure hotline number is (800) 289-9999. The FINRA web site address is <a href="www.finra.org">www.finra.org</a>. An investor brochure that includes information describing the public disclosure program may be obtained from FINRA.

### Whom to Contact

All questions concerning activity in your account should be directed to the registered representative handling your account at Tradition Securities & Derivatives, Inc..

If however, you believe the transactions in your account are unauthorized or that instructions given by you were not followed, you should promptly contact the TSD compliance department at (212) 791-3497 / (212) 483-9838 or any government agency or any self-regulatory agency having jurisdiction over your account. The primary government agency is the United States Securities & Exchange Commission (800) 732-0330 and our primary self-regulatory organization is the Financial Industry Regulatory Authority (\*FINRA\*) (800) 289-9999

If you require further information regarding our privacy policies and practices in the United States or any other information provided in this disclosure please contact:

David Merola
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