



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.

Table with 3 columns: Reasons we can share your personal information, Does ESL Investment Services, LLC share?, Can you limit this sharing? Rows include: For our everyday business purposes, For our marketing purposes, For joint marketing with other financial companies, For our affiliates’ everyday business purposes (transactions/experiences), For our affiliates’ everyday business purposes (creditworthiness), For our affiliates to market to you, For nonaffiliates to market to you.

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

| Who we are | |
|-------------------------------|------------------------------|
| Who is providing this notice? | ESL Investment Services, LLC |

| 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 805 15th Street, N.W. Suite 800, Washington, D.C. 20005-2215, tel: 202.371.8300, fax: 202.371.6728, 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.

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| 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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