Peak Brokerage Services & Blackridge Asset Management Privacy Policy

Effective: July 16, 2026

This Privacy Policy is in effect for Peak Brokerage Services, LLC and Blackridge Asset Management, LLC (collectively, “Peak,” “we,” or “us”).

Protecting your privacy is fundamental to our business. This Privacy Policy explains what nonpublic personal information we collect about you, how we use it, who we share it with, the limited circumstances in which we share it, and how you can exercise the rights you have under federal and state privacy law. Our practices are designed to comply with the Gramm-Leach-Bliley Act (“GLBA”), SEC Regulation S-P, the Fair Credit Reporting Act (“FCRA”), and applicable state consumer privacy laws.

We are affiliated firms under the common ownership of Thurston Capital Holdings and share common operational, back-office, and personnel support. As described below, we may share your nonpublic personal information among our affiliates as necessary to open and service your accounts.

This Privacy Policy is delivered to you at the time your account is opened, again each year while your relationship with us continues, and again before any material change in our information practices takes effect. It is also continuously available on our firm websites.

1. Nonpublic Personal Information We Collect

In the course of our relationship with you, we collect nonpublic personal information (“NPPI”) from the following sources:

- Information you provide on applications, new-account forms, and similar documents (name, address, Social Security number, date of birth, government identification, employment, investment objectives, financial position);
- Information about your transactions with us, our affiliates, or others (account balances, transaction history, parties to transactions);
- Information we receive from consumer reporting agencies or other third-party databases (creditworthiness, credit history) when applicable;
- Information from your visits to our websites and use of our online services (cookies and similar technologies, device information, IP address); and
- Information we receive from other financial institutions providing services to you (clearing firms, custodians, fund and annuity sponsors).

2. How We Use Your NPPI

We use your NPPI to:

- Open and service your accounts and provide the products and services you request;
- Process transactions and prepare statements, confirmations, tax forms, and other client documents;
- Comply with applicable law and respond to regulatory requirements and lawful legal process;
- Protect against fraud, unauthorized transactions, identity theft, and similar threats; and
- Improve our products, services, and customer experience.

3. With Whom We Share Your NPPI

We do not share your NPPI with non-affiliated third parties for marketing purposes. We also do not share your NPPI with our affiliates for marketing purposes. We share your NPPI only as necessary to provide products and services to you, as required by law, with your consent or direction, or under specific exceptions described below.

Non-Affiliated Third Parties

We may share NPPI with the following categories of non-affiliated third parties, in each case only as necessary to provide products and services to you or as otherwise permitted by Regulation S-P:

- Clearing firms and custodians;
- Mutual fund, annuity, insurance, and other product sponsors and their administrators;
- Service providers that perform recordkeeping, statement preparation and printing, technology, account-monitoring, and similar services on our behalf under contractual confidentiality obligations;
- Attorneys, accountants, and auditors of the firm;
- Federal, state, and self-regulatory authorities, courts, and law-enforcement agencies, in response to subpoenas, court orders, examinations, or other lawful requests; and
- Other persons or entities to whom you direct us to disclose your NPPI.

Affiliated Companies

We are under the common ownership of Thurston Capital Holdings. Because our affiliated firms share common back-office operations and personnel, your NPPI may be shared among these affiliates as necessary to open and service your accounts. Our current affiliates include:

- Thurston Springer Financial, LLC
- Thurston Springer Advisors, LLC
- TruEdge Asset Management, LLC
- Thurston Springer Insurance Agency, LLC
- MyClient, LLC
- Financial Services Holdings, LLC
- Bristal Lane Group, LLC

We may share NPPI with our affiliates only to the extent necessary to provide products and services to you. We do not share your NPPI with affiliates for marketing purposes, and accordingly the affiliate-information opt-out under FCRA §603(d)(2)(A)(iii) does not apply to our current practices.

4. Regulation S-P Exceptions to Opt-Out

Federal law permits certain disclosures of NPPI without an opt-out right. Our disclosures of NPPI to non-affiliated third parties fall within these exceptions and are made only:

- To process or service a transaction you request or authorize;
- With your consent or at your direction;
- To protect against fraud, unauthorized transactions, or liability;
- To comply with federal, state, or local law, or to respond to a properly authorized civil, criminal, or regulatory investigation, subpoena, or summons;
- To attorneys, accountants, or auditors of the firm; or
- To other parties as expressly permitted by 17 CFR 248.13 – 248.15.

5. Your Right to Opt Out

Although we do not currently share your NPPI with non-affiliated third parties for marketing purposes, you have the right to opt out of any such future disclosures (other than disclosures under the exceptions above). You may exercise this right at any time by:

- Mailing a written request to Peak Brokerage Services, LLC, Attn: Compliance Department, 1070 East Indiantown Road, Suite 208, Jupiter, FL 33477; or
- Emailing compliance@pbsrep.com.

We will honor your opt-out election as soon as reasonably practicable after we receive it.

Advisor-Departure Opt-Out (Broker Protocol)

If your Financial Advisor leaves Peak to join another firm that is a member of the Protocol for Broker Recruiting, we may permit your advisor to retain limited contact information for use by their new firm — your name, address, email address, phone number, account title, and account type. Peak Brokerage Services, LLC and Blackridge Asset Management, LLC are members of the Protocol for Broker Recruiting. If you object, you may opt out by contacting our Compliance Department using the channels above.

6. Account-Number Protection

Peak does not disclose, directly or through any affiliate, any account number, credit-card number, or similar access number or access code for your account to any non-affiliated third party for use in telemarketing, direct-mail marketing, or other marketing through electronic mail, except as expressly permitted by 17 CFR 248.12(b).

7. Limits on Our Use of NPPI We Receive From Others

When we receive NPPI about you from a non-affiliated third party (for example, your clearing firm or custodian), we use and disclose that NPPI only (i) for the purposes for which it was provided to us, (ii) as required by law, or (iii) within the Regulation S-P exceptions described above.

8. How We Protect Your Information

We maintain administrative, technical, and physical safeguards designed to protect your NPPI against unauthorized access, use, alteration, disclosure, and disposal. These safeguards include access controls, encryption of data in transit and at rest, multi-factor authentication, employee training, vendor due diligence, and routine testing. Our Incident Response Program is designed to detect, contain, and recover from security incidents involving customer information, and to notify affected individuals as required by federal and state law.

We dispose of consumer report information and other customer records in a manner designed to prevent unauthorized access — including shredding or pulverizing paper records and secure deletion or destruction of electronic media.

9. Identity-Theft Prevention

Peak maintains an Identity Theft Prevention Program designed to detect, prevent, and mitigate identity theft in connection with covered accounts, consistent with the Federal Trade Commission Red Flags Rule and SEC Regulation S-ID.

10. Children's Information

Our services are intended for adult customers. We do not knowingly collect personal information from children under 13 in violation of the Children's Online Privacy Protection Act (COPPA). If we learn we have inadvertently collected such information, we will delete it.

11. Changes to This Privacy Policy

We may revise this Privacy Policy from time to time. If we plan to disclose your nonpublic personal information to a non-affiliated third party in a manner not described in this Privacy Policy (other than under the exceptions described in Section 4), we will deliver a revised Privacy Policy and a new opt-out notice before the new disclosure takes effect, and give you a reasonable opportunity to opt out. For other changes that do not affect our disclosures to non-affiliated third parties (such as updates to our safeguards procedures or internal-use practices), we will post the updated Privacy Policy on our websites and deliver it to you at the next annual notice. The "Effective" date at the top of this Privacy Policy identifies the date of the most recent revision.

12. State Privacy Rights

Most of the personal information we collect about you is subject to the Gramm-Leach-Bliley Act and is therefore exempt from many state consumer privacy laws. The state-specific rights below apply to the extent your personal information is not exempt under the applicable state law.

California Residents (CCPA / CPRA)

California law gives California residents specific rights regarding personal information that is not subject to the GLBA exemption, including:

- Right to know the categories and specific pieces of personal information we have collected, the sources, the business purposes, and the categories of third parties with whom we share it;
- Right to delete personal information we have collected, subject to applicable exceptions;
- Right to correct inaccurate personal information;
- Right to limit our use and disclosure of sensitive personal information;
- Right to opt out of the sale or sharing of personal information (we do not sell or share personal information for cross-context behavioral advertising); and
- Right to non-discrimination for exercising these rights.

To exercise these rights, contact our Compliance Department using the contact information in Section 15 (Contact Us) below. We will respond within 45 days of receipt of a verifiable request, subject to one 45-day extension where reasonably necessary. You may designate an authorized agent to act on your behalf by providing the agent with written, signed permission.

Colorado, Connecticut, Virginia, Utah, Texas, Oregon, Delaware, Iowa, Tennessee, Indiana, Montana, New Hampshire, New Jersey, Minnesota, Maryland, Rhode Island, Kentucky, and Nebraska Residents

If you are a resident of one of these states, your state's consumer privacy law may provide you with rights similar to those described under California, including the right to access, delete, correct, and obtain a portable copy of certain personal information, the right to opt out of targeted advertising and certain profiling, and the right to non-discrimination. As with California, personal information subject to the GLBA exemption is generally outside the scope of these state laws. Where the state law applies to information we hold about you, we will honor the rights provided. To exercise a state-law right, contact our Compliance Department using the contact information in Section 15 (Contact Us) below. We will respond within the time period required by the applicable state law (typically 45 days, subject to a permitted extension).

Appeals

Several state laws (including Colorado, Connecticut, Virginia, Texas, and others) give you the right to appeal our decision on a privacy rights request. To file an appeal, contact our Compliance Department using the contact information in Section 15 (Contact Us) below and reference the original request. We will respond within the time period required by the applicable state law (typically 45 or 60 days). If your appeal is denied, you may have the right to contact your state Attorney General; information is available at naag.org.

Sale or Sharing of Personal Information

Peak does not sell your personal information and does not share your personal information for cross-context behavioral advertising under California or other state laws.

13. Cookies and Online Tracking

Our websites use cookies and similar technologies (pixel tags, web beacons, clear GIFs, and JavaScript) to recognize your browser, tell us how you use our services, analyze trends, and operate and improve our services. You can control cookies through your browser settings. Because of how our services use cookies, they do not currently respond to “Do Not Track” signals.

Where third-party advertising services are used in connection with our marketing, you can opt out of personalized advertising via the Digital Advertising Alliance (aboutads.info/choices) and the Network Advertising Initiative (networkadvertising.org/choices).

We may use Google Analytics to understand website usage. Information collected through Google Analytics is not combined with personally identifiable information. For more information about Google’s practices, visit policies.google.com/technologies/partner-sites.

14. Notice to Non-U.S. Users

Our services are intended for users in the United States. If you access our services from outside the United States, your information will be transferred to and processed in the United States, which may not provide the same level of data-protection rights as your home jurisdiction. By using our services, you consent to that transfer.

15. Contact Us

If you have questions about this Privacy Policy or want to exercise any of the rights described above, please contact our Compliance Department:

- Telephone: 1-855-949-PEAK (1-855-949-7325) or 1-561-641-5050
- Mail: Peak Brokerage Services, LLC, Attn: Compliance Department, 1070 East Indiantown Road, Suite 208, Jupiter, FL 33477
- Email: compliance@pbsrep.com

Peak Brokerage Services, LLC, Member FINRA/SIPC. Advisory services through Blackridge Asset Management, LLC, an SEC-registered investment adviser.