

# Notice of Privacy Policy

*This notice is being provided by **First Dallas Securities** and/or **Hodges Capital Management**.  
This notice is sent to you because you are a client of **First Dallas Securities** and/or **Hodges Capital Management**.*

**First Dallas Securities** and/or **Hodges Capital Management** are committed to keeping the personal information collected from our potential, current and former clients confidential and secure. The proper handling of personal information is one of our highest priorities. We want to be sure that you know why we need to collect personal information from you. We also want to explain to you our commitment to protect the information you provide to us. We never sell your information to any outside parties.

## Client Information

We collect and keep only information that is necessary for us to provide services requested by you and to administer your business with us. We may collect nonpublic personal information:

- From you when you complete an application, subscription documents or other forms. This includes information such as name, address, social security number, assets, income, net worth and other information deemed necessary to evaluate your financial needs.
- As a result of transactions with us, our affiliates or others. This could include transactions completed with us, information received from outside vendors to complete transactions or to affect financial goals.

**First Dallas Securities** will verify our clients' identity to actively prevent, deter, and detect illegal financial activity. Pursuant to the USA PATRIOT Act, all clients who open new accounts with **First Dallas Securities** will be required to provide identification verification documents to help establish their identity. At a minimum, **First Dallas Securities** will verify, to the extent reasonable and practicable, the identity of any client seeking to open an account, maintain records of information used to verify a client's identity, and check to ensure that a client does not appear on any published government terrorist lists.

## Sharing Information

**First Dallas Securities** and/or **Hodges Capital Management** will only share your nonpublic personal information with non-affiliated companies or individuals as permitted by law, such as your representative within our firm, securities clearing firm, issuer, mutual funds, insurance companies and other product vendors, or to comply with legal or regulatory requirements. In the normal course of our business, we may disclose information we collect about you to companies or individuals that contract with us to perform servicing functions such as:

- Record keeping
- Computer related services
- Good faith disclosure to regulators who have regulatory authority over the company
- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.

When we provide personal information to a service provider, we require these providers to agree to safeguard your information, to use the information only for the intended purpose, and to abide by applicable law.

## Internet Access

**First Dallas Securities** provides a website through our custodian on the Internet which is informational only. Because we gather no personal information from you, accessing this website in no way compromises your privacy.

We do not utilize Cookies, Graphics Interchange Format (GIF's), or any other web tools. You should check the privacy policy for any links provided upon leaving our website.

We provide access to your **First Dallas Securities** accounts via the Internet. Your password is your private entry key into your account. You should never share it with anyone and you should change it periodically.

After you've finished accessing your securities account, don't forget to log off. This prevents someone else from accessing your account if you leave your computer and your session hasn't "timed out," or automatically shut down.

### **Opt Out Provisions**

**First Dallas Securities** and/or **Hodges Capital Management** will not sell your personal information to anyone.

The law allows you to "opt out" of only certain kinds of information-sharing with third parties. We do not share personal information about you with any third parties that triggers this opt-out right. This means **YOU ARE ALREADY OPTED OUT.**

### **Employee Access to Information**

Only employees with a valid business reason have access to your personal information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

### **Protection of Information**

We maintain security standards to protect your information, whether written, spoken, or electronic. We update and test our systems to ensure the protection and integrity of information.

### **Disposal of Information**

Periodically, it may be necessary to dispose of the information that you have provided. We take measures to protect against unauthorized access to or use of your information in connection with its disposal.

### **Maintaining Accurate Information**

Our goal is to maintain accurate, up-to-date client records in accordance with industry standards. We have procedures in place to keep information current and complete, including timely correction of inaccurate information.

### **E-Mail**

Should you send us your questions and comments via e-mail to any mailbox provided by **First Dallas Securities** and/or **Hodges Capital Management**, we will share your correspondence with our Registered Representatives or Investment Advisors and those employees or agents most capable of addressing your questions and concerns. We will retain your communication until we have done our very best to provide you with a complete and satisfactory response. Ultimately, we will either discard your communication or archive it according to our requirements under applicable securities laws.

Please note that, unless we expressly advise you otherwise, our e-mail facilities do not provide a means for completely secure and private communications between **First Dallas Securities** and/or **Hodges Capital Management** and you, the User. Although every attempt will be made to keep your information confidential, from a technical standpoint, there is still a risk. For that reason, please do not use e-mail to communicate information to us that you consider to be confidential. If you wish, you may contact us instead via telephone or by facsimile. Additional security is available to you if you equip your Internet browser with 128-bit "secure socket layer" encryption, which provides more secure transmissions.

### **Disclosure of our Privacy Policy**

We recognize and respect the privacy concerns of our potential, current and former clients. We are committed to safeguarding this information. As a member of the financial services industry, we are sending you this Notice of Privacy Policy for informational purposes and will update and distribute it as required by law. It is also available upon request.

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