

Information About Our Company

Thank you for establishing an account with a Kestra Financial company, or engaging one of our companies to provide you financial services. Kestra Financial, Inc. is parent company to Kestra Investment Services, LLC (formerly NFP Advisor Services, LLC), Kestra Advisory Services, LLC, Kestra Private Wealth Services LLC (formerly Washington Wealth Management, LLC) and Kestra Institutional Services, LLC (formerly NFP RIA Services, LLC). The information provided below applies to these Kestra Financial companies. Your financial advisor has associated with Kestra Financial as his/her broker-dealer and/or investment adviser, to provide you investment products and services.

Please take a moment to read the following information regarding the Privacy Policies, which we apply to all client relationships, including individuals, corporate, and retirement plan clients. We have also provided disclosure information regarding select provider relationships, the public disclosure program of the Financial Regulatory Authority (FINRA) and consolidated financial account reports. If you are a client who receives advisory services from one of our companies, information about material changes to Form ADV 2A of the applicable company, and how to obtain a current copy of this disclosure document, is also enclosed. Thank you for the opportunity to help meet your financial service needs. Regulations require that we send this information to you on an annual basis. The following information is for the current year 2016.

FACTS WHAT WE 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 information 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 our privacy policies.

What?

The types of personal information we collect and share depend on the product or service we provide to you. This information can include:

- Name, address, Social Security number
- Net worth, income, assets, account transactions and balances and medical information (for insurance products)
- Investment experience and risk tolerance

How?

All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons the firm may share your information with third parties and whether you can limit this sharing.

These payments are typically made from the resources of the investment adviser or distributor (or one of their affiliates) in the case of mutual fund Select Providers and from the resources of the insurance company (or its affiliate) in the case of variable annuities, group annuities, and variable life products. The payments typically are in addition to the sales charges, rule 12b-1 fees, redemption fees, deferred sales charges and other fees and charges you will find described in the prospectus fee tables or offering documents of the various investment products.

Mutual Funds

Select Providers of mutual funds pay us either an amount of up to 0.20% of new sales of products attributable to us or fixed fees of up to \$160,000 annually to support and participate in various conferences and seminars we conduct.

Variable Annuities

Select Providers of variable annuities pay us an amount of up to 0.25% of the amount of our new sales of their products. Such providers also pay us fixed fees of up to \$25,000 annually to support and participate in various conferences and seminars we conduct.

Equity Index Annuities

Select providers of equity index annuities pay us an amount of up to 2.00% based on gross new sales volume.

Retirement Products

Select Providers of 401(k), group variable annuity and other retirement products pay us an amount of up to 0.25% of new investments in such products and an annual amount of up to 0.05% of the amount of our customers' assets under management at the Select Provider. In addition, such providers pay us fixed fees of up to \$475,000 annually to support and participate in our conferences and seminars. We may pay our financial advisors a higher percentage of compensation for sales of certain Select Provider group variable annuity products than for other such products we sell.

Alternative Investments

Select Providers of alternative investment products, including limited partnership, real estate investent trust (REIT), and hedge fund products, pay us an amount of up to 1.50% of new investments in such products. In addition, such providers pay us fixed fees of up to \$45,000 annually to support and participate in our conferences and seminars. Select Providers of alternative investment products also pay us an initial fee of up to \$5,000 and an annual fee of up to \$1,500 to support the due diligence efforts of our firm related to such products and providers.

Variable Life Insurance

Select Providers of variable life insurance products may pay our firm or our affiliated insurance agencies wholesale overrides in an amount of up to approximately 45% of first year target premium and an amount of up to approximately 4% of any renewal premiums. Select Providers of variable life products also pay us or our affiliated insurance agencies up to \$45,000 annually to support various workshops and meetings, to support development of account management tools and other technology and to support our due diligence efforts. In the case of variable life insurance products, Select Providers provide a variety of policy and underwriting support services to our firm, our affiliated insurance agencies and our financial advisors. We may pay our financial advisors a higher percentage of compensation for sales of Select Provider variable life insurance products than for other such products we sell.

Additional Information

For additional information regarding fees and compensation, you should refer to the prospectus and statement of additional information applicable to your investment.

Select Provider List

Our list of Select Providers may change from time to time and be updated periodically. Please refer to our web site at <https://securities.nfp.com/webfiles/public/Securities/providers.htm>. If you do not have access to our web site, please feel free to contact your financial advisor or our offices for additional information. The following is a list of our Select Providers as of April 1, 2016.

Select Mutual Fund Providers: American Funds, Fidelity, John Hancock, Lord Abbott, Natixis Global Associates, Nuveen, Oppenheimer Funds, PIMCO, Putnam Investments, and Principal Funds.

Select Variable Life Providers: AIG, AXA, John Hancock, Lincoln Financial Group, MetLife Investors, Metropolitan Life, Nationwide, Pacific Life, Principal, Prudential, Protective, Transamerica, Voya Reliastar, Voya Security Life.

Select Variable Annuity Providers: Allianz, AXA, CUNA Mutual, Jackson National, Lincoln Financial Group, MetLife, Nationwide, Pacific Life, Protective Life, Prudential and Transamerica.

Select Equity Index Annuity Providers: Allianz, American Equity, American General, American National, Americo. Athene, Delaware Life, Forethought Financial, Genworth, Great American, Integrity Life, Jackson National, Lafayette Life, Life of the Southwest, Lincoln Benefit Life, Lincoln Financial Group, MN Life, National Western Life, Nationwide, One America, Oxford, Pacific Life, Principal, Reliance Standard Life, Sagicor life Insurance Co, Symetra, The Standard, and Voya.

Select Retirement Product Providers: American Funds, Fidelity. MassMutual, Nationwide, Oppenheimer Funds, Principal, Securian, Standard, Transamerica, and Voya.

Select Alternative Investment Providers: Altgeris Atlas, CAIS, Central Park Group, CION, Securities, CNL Securities, Cole Capital, Dividend Capital, Franklin Square, Griffin Capital, Hines, Inland Securities. Northstar. Partners Group, Resource Real Estate, Skybridge Capital, Steadfast, Strategic Storage, Versus Capital, and WP Carey.

Reminder

You should always keep your financial advisor informed of any changes to your investment objectives. Please call your financial advisor to discuss any such changes. If you do not have a financial advisor for your account or if your financial advisor is no longer associated with a Kestra Financial company, please contact our home office at 512-697-6464.



Kestra Financial
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Reasons we can share your personal information	Do We Share	Can you limit this sharing?
For our everyday business purposes – such as to process and service transactions and account(s), respond to regulatory authorities, court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	No	No
For joint marketing with other financial companies	No	No
For our affiliates’ everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For our non-affiliates to market to you	No	We do not share
For advisors who leave a Kestra Financial. If the advisor servicing your account(s) leaves our firm to join another financial institution, the advisor may retain copies of your personal information so that he or she can continue to serve you at the new firm. In doing so, your advisor may share your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the advisor was affiliated with a Kestra Financial company, and he or she may use it only to service your account(s). Please note: Certain states require affirmative consent to allow sharing. See below for more on your rights under state law. In the event that an advisor terminates his or her relationship with Kestra Financial, and you want to follow your advisor to his or her new firm, please do not request to limit our sharing.	Yes	Yes

To limit our sharing	<ul style="list-style-type: none"> Call Kestra Financial at 512-697-6464 Mail your request to Kestra Financial Attn: Privacy Officer, 1250 Capital of Texas Hwy S, Building 2, Ste. 125 Austin, TX 78746 <p>Please note: if you are a <i>new</i> customer, we can begin sharing your information from the date we provided you with this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice; however, you may contact us at any time to limit our sharing.</p>
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Questions?	Call Kestra Financial at 512-697-6464 or go to www.kestrafinancial.com
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Who we are	
Who is providing this notice?	<p>Kestra Investment Services, LLC - Broker-Dealer and MEMBER FINRA/SIPC Kestra Advisory Services, LLC Kestra Institutional Services, LLC Kestra Private Wealth Services, LLC</p> <p>This notice describes the privacy policies of the Kestra Financial companies above. Your financial advisor has associated with our broker-dealer and/or one of the investment advisers above to provide you products and services. These privacy policies apply to clients who obtain or apply for a financial product or service, or have done so in the past, with any of these listed entities. They do not apply to any outside business activity your financial advisor may engage in separate from our companies.</p>

What we do	
How we protect personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with applicable law. These measures include computer safeguards and secured files and buildings. When we share information with third parties, we hold all such parties to the same standards as we do ourselves regarding the privacy of your information. We have policies designed to ensure only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic and procedural security measures that comply with applicable regulations to protect your information. We train our employees in the proper handling of personal information.

How do we collect personal information?	<p>We collect personal information, for example, when you</p> <ul style="list-style-type: none"> Open a brokerage account or engage us for investment advisory services Purchase investment and insurance products or seek advice about your investments Provide us information on applications, questionnaires, or other forms, websites or through discussions with our customer support staff or your financial advisor <p>We also collect your personal information from others, such as 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 – information about your creditworthiness Affiliates from using your information to market to you Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. The Kestra Financial companies may utilize common information systems or databases to which employees of our affiliates may have access that could contain your information however such information will not be disclosed by a Kestra affiliate except as permitted by law.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies. Affiliates for this</p> <ul style="list-style-type: none"> <i>Our affiliates include Kestra Financial, Inc. and its subsidiaries.</i>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <i>We do not share with non-affiliates so they can market to you. For example, we will not sell names and addresses to marketing companies.</i>
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <i>We do not joint market.</i>

Other Important Information	
FINRA Public Disclosure Program	
<p><u>FINRA Conduct Rule 2280 requires us</u> to provide you with the following information about Kestra Investment Services, LLC</p> <p>The FINRA Regulation Public Disclosure Program Address, Hotline Number and Facsimile Telephone number are: Public Disclosure FINRA Regulation, Inc., P.O. Box 9401, Gaithersburg, Maryland 20898-9401 Telephone: 800.289.9999, Fax: 301.212.8137 FINRA Regulation Website address is: www.FINRA.org</p>	
<p>If you live in an “opt-in” state, where we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business, your advisor is required to obtain your consent before your advisor can take your information with him or her should your advisor leave our firm.</p>	
<p>California residents: For accounts with a California mailing address, we will not share your personal information with a financial company for joint marketing purposes, except as required or permitted by law.</p>	
<p>Vermont residents: For accounts with a Vermont mailing address, we will not share your creditworthiness information with our affiliates, except as required or permitted by law. For joint marketing with other financial companies, we will disclose only your name, contact information, and information about your transactions, unless otherwise required or permitted by law.</p>	

<p>The FINRA Regulation Public Disclosure Program publishes an investor brochure that is available by contacting Public Disclosure at the above telephone number or address.</p> <p>If you have any questions or concerns regarding your account, please feel free to contact your financial advisor or our offices at 512-697-6464.</p> <p><u>Review of Account Statements/Consolidated Financial Account Reports</u></p> <p>We have agreements with multiple sponsors of investment and insurance products, such as mutual funds, insurance carriers, and other companies with which you may have investments or that hold your assets. Our broker-dealer clears its brokerage business through a third-party custodian, National Financial Services, LLC (NFS). Our investment advisers conduct investment advisory business through third-party custodians, such as NFS and Charles Schwab & Company. Our financial advisors may provide you a consolidated financial account report or other summary of your accounts as a courtesy and for informational purposes. These reports could include assets that are not held by or through our firm and are not covered by the Securities Investor Protection Corporation (SIPC). You should always refer to your original statements from companies that maintain custody of your assets to confirm the amount and value of investments held by these companies. From time to time we or a third party auditor that we hired to meet our regulatory requirements, may contact you to verify assets held in custody by third-party custodians and sponsors of investment and insurance products. You should regularly review account statements you receive and contact your financial advisor or our firm <u>immediately</u> if you believe there are any discrepancies. You may also go to www.FINRA.org or www.sec.gov for more consumer information. For more information about your accounts and statements please contact your financial advisor.</p> <p><u>Other Business Services</u></p> <p>Our financial advisors often provide other business services that are not related to Kestra Financial. For example a financial advisor of ours may also be a licensed CPA, attorney or other professional service provider. It is important to note that the Kestra Financial companies do not provide other professional services such as tax advice and legal advice.</p> <p><u>Form ADV 2A - Material Changes and Offer</u></p> <p>Rule 204-3 of the Investment Advisers Act requires an investment adviser to annually summarize any material changes in its disclosure to clients and offer to deliver a copy of its current disclosure document to clients. Below is a summary of material changes for each of our investment advisers since their last Form ADV filing.</p> <p>Kestra Advisory Services, LLC – Rebranded and successor to NFP Advisor Services, LLC Kestra Institutional Services, LLC – Rebranded from NFP RIA Services, LLC Kestra Private Wealth Services, LLC– Rebranded from Washington Wealth Management, LLC</p> <p>To request a copy of a Form ADV 2A for your applicable investment adviser, please contact us at 512-697-6464.</p> <p>Select Provider Relationships</p> <p>Our Select Provider Relationship information may change from time to time and be updated periodically. Please refer to our web site at https://internal.nfp.com/webfiles/public/Securities/company.htm. We make available hundreds of different mutual fund and variable insurance products to our financial advisors and customers. We also make available many retirement vehicles such as 401(k) and group variable annuity products, as well as alternative investment products such as limited partnerships, real estate investment trusts, and hedge fund products. Our financial advisors are free to choose what investment products they sell to customers from among these many product offerings. Because of the numerous investment and insurance alternatives available, our firm focuses on the sale of investment products of a select number of providers (Select Providers). Select Providers are given increased access to our financial advisors for the purpose of providing marketing, sales, education and product support.</p> <p>Kestra Investment Services, LLC receives both financial and non-financial support from Select Providers. We receive more compensation for the sale of products of Select Providers than for the products of other providers we sell and thus have a financial incentive to sell the products of Select Providers. The amounts and forms of compensation we receive from Select Providers vary based on a number of factors including level of past sales, prospective future sales and the types of service, education, support and access to distribution we provide. We receive one or more of the forms of compensation described below in connection with our arrangements with each Select Provider.</p>
