

Privacy Policy and Disclosures

Kestra Investment Services, LLC | Kestra Advisory Services, LLC | Kestra Institutional Services, LLC | Kestra Private Wealth Services, LLC | Kestra Investment Management, LLC | Kestra Insurance Services, LLC | Bluespring Wealth Partners, LLC

Thank you for establishing an account or investment advisory relationship with a Kestra Financial, Inc. (“Kestra Financial”) company. Kestra Financial is the parent company of Kestra Holdings, Kestra Investment Services, LLC, Kestra Advisory Services, LLC, Kestra Private Wealth Services LLC, Kestra Investment Management, LLC, Kestra Insurance Services, LLC, Bluespring Wealth Partners, LLC, and Kestra Institutional Services, LLC. The information provided below applies to these Kestra Financial companies. Your financial professional has associated with a Kestra Financial company as his/her broker-dealer and/or investment adviser, to provide you investment 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 the Kestra Financial companies referenced above. They do not apply to any outside business activity your financial professional may engage in separate from our companies.

Please take a moment to read the following information regarding our privacy policies, which apply to all client relationships, including individual, corporate, and retirement plan clients. We also have provided disclosure information regarding select provider relationships, the public disclosure program of the Financial Industry 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 provided. Regulations require that we send this information to you on an annual basis. The following information is for the current year 2023.

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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 information we collect and share depend on the product or service we provide to you. This information can include: <ul style="list-style-type: none"> ▪ Name, address, Social Security number ▪ Net worth, income, assets, account transactions and balances and medical information (for insurance products)
HOW?	We need to share personal information to provide services to you and run our everyday business. In the section below, we list the reasons we may share your information with third parties and whether you can limit this sharing.

Reasons we can share your personal information:	Do we share?	Can you limit 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	Yes	No
For joint marketing with other financial companies	No	We do not share
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	Yes	No
For our non-affiliates to market to you	No	We do not share
If the financial professional servicing your account(s) leaves to join another financial institution, they may retain copies of your personal information so that he or she can continue to serve you at their new firm. In the event of such a transition, your financial professional should not share your information with a third party without your consent other than as necessary to continue to provide you services. Please note: Certain states require affirmative consent to allow sharing. See below for more information on your rights under state law. In the event that a financial professional terminates his or her relationship with a Kestra Financial company, and you want to follow your financial professional to his or her new firm, please do not request to limit our sharing.	Yes	Yes

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To limit our sharing	<ul style="list-style-type: none"> ▪ Call Kestra Financial at 737-443-2445 ▪ Mail your request to Kestra Financial <ul style="list-style-type: none"> ○ Attn: Privacy Officer, 5707 Southwest Parkway, Building 2, Ste. 400 Austin, TX 78735 <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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What We Do	
How we protect personal information?	To protect your personal information from unauthorized access and use, we use commercially reasonable technical and physical security measures that comply with applicable law. When we share information with third parties, we hold parties to commercially reasonable standards of privacy protection. 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?	We collect personal information, for example, when you <ul style="list-style-type: none"> ▪ Open a brokerage account or engage us for investment advisory services ▪ Purchase investment and insurance products or seek investment 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 professional We also collect your personal information from others, such as affiliates or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only: <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 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.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Affiliates include Kestra Holdings and its subsidiaries.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ 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.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ We do not joint market.

Some state laws grant additional privacy rights to their residents. 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

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do not currently assist us in servicing your account or conducting our business, your financial professional is required to obtain your consent before they can take your information with him or her should they leave our firm.

California residents: For California residents, we will not share your personal information with nonaffiliated third parties, except as required or permitted by law. In addition, for California residents, you are afforded certain rights regarding the nonpublic personal information that we collect from you, including the right to know what personal information we have collected from you, what it is being used for, whether it is being disclosed or sold to nonaffiliated third parties, to whom it is being disclosed or sold, and the right to request that we delete certain personal information that we have collected from you. Please see pages 2 and 3 of this notice for more information.

Vermont residents: For Vermont residents, we will not share your creditworthiness information with our affiliates, except as required or permitted by law.

Review of Account Statements/Consolidated Financial Account Reports

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 professionals 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 professional or our firm immediately 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 professional.

Other Business Services

Our companies provide securities brokerage and investment advisory services. Some of our financial professionals provide other business services that are not related to or the responsibility of Kestra Financial. For example, a financial professional 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 and legal advice.

Form ADV 2A - Material Changes and Offer

To request a copy of a Form ADV 2A for your applicable investment adviser, please contact us at 737-443-2445.

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Select Provider Relationships

We make available hundreds of different mutual fund and variable insurance products to our financial professionals 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 professionals are free to choose what investment products they sell to customers from the many product offerings we approve. 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 professionals for the purpose of providing marketing, sales, education and product support.

Kestra Financial 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.

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, ETFs and UITs

Select Providers of mutual funds and ETFs pay us or our affiliate either an amount of up to 0.05% on AUM for products attributable to us, or fixed fees of up to \$225,000 annually, or up to 20% of the weighted average net expense ratio of ETFs participating in the Kestra NTF ETF program, and 0.175% on AUM of UITs. We also receive fixed fees of up to \$60,000 annually to support and participate in various conferences and seminars conducted by us and our affiliates. Our affiliate receives up to \$19,000 through the free ticket program.

Variable Insurance Products – Variable Annuities and Variable Life Insurance

Select providers of variable insurance – pay our affiliate, Kestra IS, an amount up to .25% of the amount of our new sales of their variable annuity products quarterly. Select providers of variable life insurance products also pay our affiliate, Kestra IS, or their affiliated insurance agencies wholesale overrides in an amount up to approximately 31% of first year target premium and an amount up to approximately 4% of any renewal premiums of their variable life products. These providers will also pay our affiliate, Kestra IS, fixed fees of up to \$75,000 annually to support various workshops and meetings, to support development of account management tools and other technology and to support due diligence efforts conducted by us and our affiliates. In the case of variable life insurance products, Select Providers provide a variety of policy and underwriting support services to Kestra IS, our affiliate and our Advisors. Kestra IS may pay our Advisors a higher percentage of compensation for sales of Select Provider variable life insurance products than for other such products we sell.

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Kestra IS provides a higher compensation schedule for the sale of variable life insurance products to members of PartnersFinancial than to non-members. Members of PartnersFinancial are also eligible to receive bonus payments from PartnersFinancial for the sale of these products. Please ask your Advisor or contact our offices if you are unsure whether your Advisor is a member of PartnersFinancial.

Equity and Fixed Indexed Annuities

Select providers of equity and fixed indexed annuities pay us or our affiliate an amount of up to 0.15% based on gross new sales volume. Such providers also pay us or our affiliate fixed fees of up to \$75,000 annually to support and participate in various conferences and seminars conducted by us and our affiliates.

Retirement Products

Select Providers of 401(k), group annuity and other retirement products pay fixed fees for the benefit of Kestra AS or its affiliates up to \$125,000 annually to support and participate in conferences and seminars.

Alternative Investments

Select Providers of alternative investment products, including limited partnership, real estate investment trust (REIT), and hedge fund products, pay us or our affiliate an amount of up to 1.00% of new investments in such products. In addition, such providers pay us or our affiliate fixed fees of up to \$75,000 annually to support and participate in conferences and seminars. Select Providers of alternative investment products also pay us or our affiliates an initial fee of up to \$5,000 and an annual fee of up to \$1,500 to support the due diligence efforts of Kestra IS and its affiliates related to such products and providers.

Securities Backed Lines of Credit

Kestra IS has entered into a securities backed lending (SBLOC) program with The Bancorp Bank, Tristate Capital Bank, and Goldman Sachs Private Bank Select. This program allows clients to use their securities as collateral in order to obtain a line of credit. In consideration for marketing of their SBLOC programs, the Bancorp Bank, Tristate Capital Bank, and Goldman Sachs Private Bank Select pay Kestra IS quarterly revenue sharing payments up to 50 bps based on the average daily outstanding loan balance (total loan amount) of the SBLOC. Additional details are available regarding this calculation upon request. Such providers also pay us or our affiliate Kestra IS fixed fees of up to \$85,000 annually to support and participate in various conferences and seminars conducted by us and our affiliates.

Fixed Income

Advisors Asset Management, Inc. (AAM) is a Select Provider for fixed income securities transactions. First Trust Portfolios, LP is a Select Provider for structured product transactions.

Deposit Products

We have a relationship with Goldman Sachs that allows our Advisors to make available non-securities deposit products and services, including a high-yield savings account. We or an affiliated company receive a fee in connection with each account opened through this program. The fee ranges from 15 bps to 37.5 bps and is based on the Target Federal Funds Rate. Although the fee is not shared with our Advisors, we have an incentive to recommend clients open accounts with Goldman Sachs since we or our affiliate will receive compensation, which is a conflict of interest.

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Our Select Provider Relationship information may change from time to time and be updated periodically. Please refer to our web site at <https://www.kestrafinancial.com/disclosures/company-information> for additional information.

Select Provider List

The following is a list of our Select Providers as of April 1, 2023.

Select Mutual Fund Providers: American Funds, BlackRock, Fidelity Investments, Horizon Investments, Invesco, Lord Abbott, Meeder, Nuveen, Principal Funds and Putnam Investments.

Select Variable Life Providers:, Equitable, John Hancock Life, Lincoln Financial, MassMutual, Nationwide, Pacific Life, Penn Mutual, Principal Financial, Protective, Prudential and Securian Life

Select Variable Annuity Providers: AIG, Allianz, Brighthouse Financial, CUNA Mutual Group, Equitable, Global Atlantic/Forethought, Jackson National, Lincoln Financial Group, Nationwide, New York Life, Pacific Life, Principal, Protective Life, Prudential, Sammons Financial Network and Transamerica.

Select Equity and Fixed Indexed Annuity Providers: AIG, Allianz, American Equity, Athene, Cuna Mutual Group, Global Atlantic, Great American, Jackson National, Lincoln Financial Group, Midland National Life, Nationwide, Pacific Life, Principal, Protective, Prudential, Sammons Financial Network and Transamerica..

Select Retirement Plan Providers: American Funds, Fidelity, Principal, Voya, Transamerica and Nationwide.

Select Alternative Investment Providers: Black Creek Group, Blackstone, CAIS, Central Park Group, Griffin Capital, Hines, LaSalle Investment Management, and SkyBridge Capital.

Select ETF Providers: First Trust Portfolios L.P., Horizon, Principal, and Wisdom Tree.

FEES

For additional information regarding fees and compensation, you should refer to the prospectus and statement of additional information applicable to your investment. If you have an account held at NFS, we have attached a summary of brokerage fees for your convenience.

Reminder

You should always keep your financial professional informed of any changes to your investment objectives or financial circumstances. Please call your financial professional to discuss any such changes. If you do not have a financial professional for your account or if your financial professional is no longer associated with a Kestra Financial company, please contact our home office at 737-443-2445.

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If you have any questions or concerns regarding your account, please feel free to contact your financial professional or our offices at 737-443-2445

FINRA Public Disclosure Program

The FINRA Regulation Public Disclosure Program publishes an investor brochure that contains additional information about Kestra Investment Services, LLC and is available by contacting:

The FINRA Regulation Public Disclosure Program

P.O. Box 9401

Gaithersburg, Maryland

20898-9401

Telephone: 800.289.9999

Fax: 301.212.8137

FINRA Website address: www.FINRA.org

If you have any questions or concerns regarding your account, please feel free to contact your financial professional or our offices at 737-443-2445