



SWBC Investment Services, LLC  
9311 San Pedro, Suite 600  
San Antonio, TX 78216  
T (866) 884-2605  
F (210) 525-9461

## Notice of Privacy Promise

The Firm is providing this notice because you are a customer.

We are committed to keeping the personal information collected from our potential, current, and former customers 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.

### Customer 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 our affiliates, others or us. This could include transactions completed with us, information received from outside vendors to complete transactions, or to effect financial goals.

**We verify our customers' identity to actively prevent, deter, and detect illegal financial activity.**

As of October 2003, pursuant to the USA PATRIOT Act, all customers who open new accounts will be required to provide identification verification documents to help establish their identity. At a minimum, we will verify, to the extent reasonable and practical, the identity of any customer seeking to open an account, maintain records of information used to verify a customer's identity, and check to ensure that a customer does not appear on any published government terrorist lists.

### Important Information about Procedures for Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

### Sharing Information

We 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.

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.

### Opt Out Provisions

**WE do not sell your personal information to anyone.**

The law allows you to "opt out" of only certain kinds of information sharing with third parties. The Firm does not share personal information about you with third parties that trigger 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.

### Maintaining Accurate Information

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

### Disclosure of our Privacy Policy

We recognize and respect the privacy concerns of our potential, current and former customers. 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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## Business Continuity Plan

SWBC INVESTMENT SERVICES, LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** - If after a significant business disruption you cannot contact us as you usually do, you should call our alternative number 866-884-2605 or email us at [invoperations@swbc.com](mailto:invoperations@swbc.com).

**Our Business Continuity Plan** - We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, National Financial Services LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, our clearing firm has advised us that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within approximately a 4-24 hour time period. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** - Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within approximately a 4-12 hour time period. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our customer emergency numbers, 210-525-1241 or 210-635-1200 how to contact us.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

**For more information** - If you have questions about our business continuity planning, you can contact us at 210-321-7252, [jpalmer@swbc.com](mailto:jpalmer@swbc.com).

# SWB

SWBC INVESTMENT SERVICES, LLC  
9311 SAN PEDRO  
SUITE 600  
SAN ANTONIO, TX 78216

## SEC Rule 606 Quarterly Report for the Quarter Ending September 30, 2017

### Securities Listed on New York Stock Exchange

#### Summary Statistics:

Non-directed orders as percentage of total customer orders	100.00%
Market orders as percentage of total market orders	80.62%
Limit orders as percentage of total limit orders	17.94%
Other orders as percentage of total other orders	1.44%

#### Venues Receiving Significant Percentage of Total Non-Directed Orders:

1. VIRTU Americas LLC	36.84%
2. Citadel Securities LLC	34.93%
3. New York Stock Exchange	6.70%
4. Two Sigma Securities, LLC	6.70%
5. G1 Execution Services, LLC	4.31%
6. BATS BYX Exchange	2.63%
7. EDGX Exchange, Inc.	1.67%
8. Instinet LLC	1.67%
9. BATS BZX Exchange	1.67%
10. UBS Securities, LLC	1.44%

#### Information Concerning Significant Venues:

##### 1. VIRTU Americas LLC

###### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	41.25%
Limit orders as percentage of total limit orders	20.00%
Other orders as percentage of total other orders	0.00%

##### 2. Citadel Securities LLC

###### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	38.87%
Limit orders as percentage of total limit orders	12.00%
Other orders as percentage of total other orders	100.00%

3. New York Stock Exchange

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	37.33%
Other orders as percentage of total other orders	0.00%

4. Two Sigma Securities, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	8.31%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

5. G1 Execution Services, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	4.75%
Limit orders as percentage of total limit orders	2.67%
Other orders as percentage of total other orders	0.00%

6. BATS BYX Exchange

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	3.26%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

7. EDGX Exchange, Inc.

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	9.33%
Other orders as percentage of total other orders	0.00%

8. Instinet LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	1.78%
Limit orders as percentage of total limit orders	1.33%
Other orders as percentage of total other orders	0.00%

9. BATS BZX Exchange

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	9.33%
Other orders as percentage of total other orders	0.00%

10. UBS Securities, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	1.19%
Limit orders as percentage of total limit orders	2.67%
Other orders as percentage of total other orders	0.00%

## Securities Listed on The Nasdaq Stock Market

### Summary Statistics:

Non-directed orders as percentage of total customer orders	100.00%
Market orders as percentage of total market orders	83.08%
Limit orders as percentage of total limit orders	14.62%
Other orders as percentage of total other orders	2.31%

### Venues Receiving Significant Percentage of Total Non-Directed Orders:

1. Citadel Securities LLC	38.46%
2. VIRTU Americas LLC	31.54%
3. Instinet LLC	6.15%
4. NASDAQ Execution Services, LLC	6.15%
5. G1 Execution Services, LLC	4.62%
6. Two Sigma Securities, LLC	3.85%
7. BATS BYX Exchange	3.08%
8. BATS BZX Exchange	3.08%
9. EDGX Exchange, Inc.	1.54%
10. WOLVERINE SECURITIES, LLC	1.54%

### Information Concerning Significant Venues:

#### 1. Citadel Securities LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	43.52%
Limit orders as percentage of total limit orders	5.26%
Other orders as percentage of total other orders	66.67%

#### 2. VIRTU Americas LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	34.26%
Limit orders as percentage of total limit orders	15.79%
Other orders as percentage of total other orders	33.33%

#### 3. Instinet LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	6.48%
Limit orders as percentage of total limit orders	5.26%
Other orders as percentage of total other orders	0.00%

#### 4. NASDAQ Execution Services, LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	42.11%
Other orders as percentage of total other orders	0.00%

5. G1 Execution Services, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	5.56%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

6. Two Sigma Securities, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	4.63%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

7. BATS BYX Exchange

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	3.70%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

8. BATS BZX Exchange

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	21.05%
Other orders as percentage of total other orders	0.00%

9. EDGX Exchange, Inc.

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	10.53%
Other orders as percentage of total other orders	0.00%

10. WOLVERINE SECURITIES, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	1.85%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

## Securities Listed on NYSE MKT or Regional Exchanges

### Summary Statistics:

Non-directed orders as percentage of total customer orders	100.00%
Market orders as percentage of total market orders	96.68%
Limit orders as percentage of total limit orders	3.32%
Other orders as percentage of total other orders	0.00%

### Venues Receiving Significant Percentage of Total Non-Directed Orders:

1. Citadel Securities LLC	41.20%
2. VIRTU Americas LLC	39.53%
3. G1 Execution Services, LLC	5.32%
4. Two Sigma Securities, LLC	5.32%
5. BATS BYX Exchange	2.33%
6. Instinet LLC	1.66%
7. NYSE Arca	1.33%
8. BNY Mellon Capital Markets LLC	1.00%
9. EDGX Exchange, Inc.	1.00%
10. UBS Securities, LLC	1.00%

### Information Concerning Significant Venues:

#### 1. Citadel Securities LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	41.92%
Limit orders as percentage of total limit orders	20.00%
Other orders as percentage of total other orders	0.00%

#### 2. VIRTU Americas LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	40.55%
Limit orders as percentage of total limit orders	10.00%
Other orders as percentage of total other orders	0.00%

#### 3. G1 Execution Services, LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	5.50%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

#### 4. Two Sigma Securities, LLC

##### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	5.50%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

5. BATS BYX Exchange

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	2.41%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

6. Instinet LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	1.72%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

7. NYSE Arca

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	40.00%
Other orders as percentage of total other orders	0.00%

8. BNY Mellon Capital Markets LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	1.03%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

9. EDGX Exchange, Inc.

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	30.00%
Other orders as percentage of total other orders	0.00%

10. UBS Securities, LLC

Types of Orders Routed to Venue:

Market orders as percentage of total market orders	1.03%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

## Exchange - Listed Options

### Summary Statistics:

Non-directed orders as percentage of total customer orders	100.00%
Market orders as percentage of total market orders	50.00%
Limit orders as percentage of total limit orders	50.00%
Other orders as percentage of total other orders	0.00%

### Venues Receiving Significant Percentage of Total Non-Directed Orders:

1. The Chicago Board Options Exchange	50.00%
2. EDGX Option Exchange	50.00%

### Information Concerning Significant Venues:

1. The Chicago Board Options Exchange

#### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	100.00%
Limit orders as percentage of total limit orders	0.00%
Other orders as percentage of total other orders	0.00%

2. EDGX Option Exchange

#### Types of Orders Routed to Venue:

Market orders as percentage of total market orders	0.00%
Limit orders as percentage of total limit orders	100.00%
Other orders as percentage of total other orders	0.00%

## **Disclosure Regarding Additional Compensation Received by SWBC Investment Services, LLC**

SWBC Investment Services, LLC ("SWBC") is providing this disclosure statement to assist you in evaluating investment options made available through the Firm's representatives. The information provided is a general description of revenue payments and benefits that we receive in connection with providing certain investment related services to you. This notice may be changed periodically, and the most recent version will be posted on the Firm's website, [www.swbc.com](http://www.swbc.com), under "Investment Disclosures." SWBC believes these arrangements do not compromise the advice your financial representative gives you.

Through these arrangements SWBC receives varying amounts of payments known as marketing revenue from certain Insurance and Investment Companies. These payments could potentially create a conflict of interest because of the additional access to firm's representatives as outlined below.

These providers typically compensate SWBC in the form of a fixed-dollar commitment, payments based on sales or a combination of both. The amount of fixed-dollar revenue received from each provider may be based on the level of sponsorship selected by the provider on an annual basis. The list of such providers, provided below, may change from time to time.

### **Insurance Companies   Mutual Fund**

AIG	Franklin Templeton Investments
Allianz	Frost Investments
American National	MFS
AXA	Oppenheimer Funds
Borden Hamman	
Brighthouse Financial	
Jackson National	
Pacific Life	
Prudential	

In exchange for these payments received by the Firm, the providers receive enhanced access to your Representatives. Such access may include (i) the opportunity to speak at Firm conferences, presentations, meetings or events at which your Representative may be in attendance; (ii) increased prominence on internal communications, such as ads/logo's in conference notebooks and internal advisor publications; and (iii) other opportunities to interact directly or indirectly with your Representative, beyond what other providers may enjoy. This access to your Representative provides these companies increased opportunities for marketing, educating and training Representatives about their services, which, in turn, may increase our Representatives' knowledge and familiarity of their services versus other provider's services. This may influence your Representative when making recommendations to you and other clients. Companies that do not provide this revenue may not receive the same level of access to our Representatives. Additionally, we may also use the payments to offset costs associated with conducting due diligence, operating the Firm, conducting other meetings/events, and as general revenue of the Firm.