

ICA COMPLIANCE UPDATE

CLIENT POLICY – WEBSITE USAGE

JUNE 21, 2004

Investment Centers of America, Inc. (ICA) Compliance Updates represent a modification or clarification of the Firm's written policies and procedures. The information contained herein supersedes any and all information related to the above-entitled issue that had previously been distributed by ICA. The Update is considered to be a formal amendment to the Firm's supervisory procedures as of the above date. This information will be posted in the Compliance tab on the ICA Website, as an update to the Firm's Written Supervisory Procedures.

We have seen an increase in state level regulations regarding business websites having the ability to collect client data (i.e. client name, email address, mailing address, etc.). To comply with these regulations, **all** Representatives who host or facilitate a securities-related website/webpages must post the appropriate privacy policy link(s) on their sites. This also includes Representatives who use a third party website to market their services (i.e. Representatives who have partnered with a Financial Institution, where the primary website is hosted by the Financial Institution but the Representative's services are listed therein).

Effective July 1, 2004, the following requirements must be in place for Representatives who host/facilitate a securities related website/webpages.

- Post a text or icon hyperlink from the Home Page of their securities-related website entitled "ICA Privacy Policy". This link must route to http://www.investmentcenters.com/public/forms/ica_madv6130a.pdf.
- If the website discusses products and/or services not provided through ICA, a separate Privacy Policy related to these issues must be posted. ICA cannot provide Legal advice related to the creation or posting of this Privacy Policy, nor should ICA be listed by name in this policy.

Text Link Requirements

- Must be written in capital letters equal to or greater in size than the surrounding text; or
- Must appear in contrasting type, font, or color to the surrounding text of the same size, or offset from the surrounding text of the same size by symbols or other marks that call attention to the language.

Icon Link Requirements

- Must be titled "ICA Privacy Policy" and appear in a color contrasting the background color of the webpage or must be otherwise distinguishable.

Note: Although ICA is solely concerned with securities-related websites, Representatives who currently host a non-securities related site should also comply with this requirement. Many states now require such information to be posted to business-oriented websites.

As part of our surveillance process, we will be conducting random reviews of websites to ensure Representatives are in Compliance with this requirement.

Attention Representatives who utilize Emerald or Advisorsquare: ICA now requires these providers to post a link to the ICA Privacy Policy on all securities related websites. Responsibility for posting privacy policy information regarding non-securities related products and/or services remains with the Representative.

If you have questions regarding these new policies, which take effect **July 1, 2004**, please contact the ICA Compliance Department at 866-275-4422, option 3.