

The O.N. Equity Sales Company and Its Affiliated Companies



Privacy Policies and Practices

The O.N. Equity Sales Company ("ONESCO") and its affiliated companies are sending you this notice in accordance with federal law, which requires financial institutions to disclose their privacy policies and practices to consumers who purchase their products and services primarily for personal, family or household purposes.

Collection of Information

We gather private and nonpublic personal information about you in order to provide you with our products and services. The information we collect starts with the information you provide on applications and other forms and when you request services from us. We seek to collect and use only information that is necessary and appropriate for the needs of our business. We may collect information that relates to your investment needs and objectives, income, finances, employment, investments, and other factors that properly relate to the products or services we are providing. We may search public records for relevant information about you. If you seek to purchase an insurance product or service through us, we may also receive information about your health and other factors needed by the insurer for that purpose. Maintaining complete and accurate information on our customer's records is important. If you become aware that we may have any inaccurate information, please write or call us at ONESCO, P.O. Box 371, Cincinnati, Ohio 45201, telephone number 1.877.663.7267.

Disclosure of Information

ONESCO does not disclose private or nonpublic personal information about our customers or former customers to anyone, except as required or permitted by law or as authorized by you in writing. We do not sell customer lists or any information about our customers. We may share information about you with our affiliated companies. Also, we may share information about you with companies and individuals who perform services on our behalf. Examples would include the following:

- sharing personal information with another broker/dealer for purposes of completing your requested transaction
- sharing information with other service providers who distribute legally required documents such as prospectuses, annual reports and proxy statements

Before disclosing information to those who provide services to us, we require them to agree to keep any private or nonpublic personal information about our customers confidential and to use it only for the purposes we have authorized. We may disclose information about you in response to a subpoena or other legal process and to protect against fraud.

Protecting Confidentiality of Customer Records

Your files or records are made available only to our personnel or representatives who need access to the information in order to perform their assigned duties. In order to protect the confidentiality of nonpublic personal information we have gathered and maintain about our customers, we routinely:

- (1) maintain and monitor physical, electronic, and procedural safeguards,
- (2) review our policies and procedures,
- (3) monitor our computer networks, and
- (4) test the strength of our security.

Affiliated Companies

In addition to ONESCO, this notice also covers the following affiliated companies:

Ohio National Equities, Inc. (ONEQ);
O.N. Investment Management Company (ONIMCO);
and Ohio National Insurance Agency, Inc. (ONINSA).

Do You Need to Do Anything?

You do not need to take any action in response to this notice of our Privacy Policies and Practices. Because we do not share your private or nonpublic personal information with nonaffiliated third parties other than as described above, you do not need to opt-out or opt-in. If, however, you want more information concerning our privacy policies and practices, please contact us by mail at:

Ohio National Financial Services
Corporate and Marketing Communications
One Financial Way
Cincinnati, Ohio 45242

or by telephone at 513.794.6100.

SIPC Disclosure

The O.N. Equity Sales Company (ONESCO) is a member of the Securities Investor Protection Corporation (SIPC), which protects securities customers of its members up to \$500,000 (including \$100,000 for claims for cash). An explanatory brochure is available upon request or at www.sipc.org. You may contact SIPC via telephone at 202.371.8300.

O.N. Investment Management Company Form ADV Part II Delivery

If you are a client of the O.N. Investment Management Company (ONIMCO) and would like a copy of Part II of ONIMCO's Form ADV free of charge, please send a written request to the attention of Compliance, P.O. Box 371, Cincinnati, OH 45201.