



PARADIGM  
EQUITIES, INC.

FAIRWAY  
INVESTMENT GROUP, LLC



Securities offered through

PARADIGM EQUITIES, INC.

member FINRA/SIPC



Securities offered through LPL Financial, member  
FINRA/SIPC. Investment advice offered through  
Fairway Investment Group, LLC a registered investment  
advisor and is a separate entity from LPL Financial.

Paradigm and Fairway are wholly-owned  
subsidiaries of MEA Financial Services  
1216 Kendale Blvd., PO Box 2501,  
East Lansing, MI 48826-2501  
517-351-2122



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### Privacy Policy

### Business Disruption Policy

### FINRA BrokerCheck Program

The goal of MEA Financial Services is to provide high quality programs supported by excellent customer service. We value your business and we appreciate the trust you have placed in us. As a customer of MEA Financial Services, we take the safeguarding of your personal information very seriously.

MEA Financial Services, the parent company of its two affiliates Paradigm Equities, Inc. and Fairway Investment Group, LLC (collectively referred to as the Group), offers a variety of services including property, casualty and life insurance. Paradigm Equities, Inc., a registered broker dealer, offers a variety of investment options, including but not limited to 403(b) plans, annuities, IRA's, and mutual funds. Fairway Investment Group, LLC, a registered investment advisor, offers fee-based investment advisory services.

Please read the following information carefully to understand the Group's policy regarding the protection, use and sharing of customer information.

We do not sell any customer's personal information for purposes of solicitation.

## Information We Collect

The categories of information that the Group collects depend on the product or service that we provide you. Your "Customer Information" includes all nonpublic personal information that you provide to the Group online or on applications or other forms, or through discussions that we have with you or your representatives. Examples of Customer Information that we may collect include your name, mailing address, date of birth, social security number, email address, occupation, place of employment, telephone number and financial information that is necessary for us to process your application or related forms such as beneficiary designations. Customer Information may also include medical history information and information obtained from consumer reporting agencies if you purchase life insurance, as well as motor vehicle reports and previous carrier claim history reports if you purchase auto or home insurance.

The Group authorizes its employees to access your Customer Information for the Group's business purposes only. Access is authorized based upon an employee's need to know such information to provide products and services to you or to answer your inquiries. Employees who have access to Customer Information are required to protect it and maintain confidentiality.

## How We Use and Share Customer Information

The Group uses and shares your Customer Information internally to process your requests relating to financial products and services we provide to you. When required, we also disclose your Customer Information to nonaffiliated parties as permitted by law in order to transact your business and to process account transactions that you request or authorize. Additionally, as a member benefit service, we may share Customer Information pertaining to past and current members internally and with nonaffiliated parties in order to notify you about products and services available through a Group company.

Each nonaffiliated party with whom we share Customer Information is a financial service provider (such as a broker dealer or an insurance agent) and either (1) performs marketing services on your behalf or on behalf of you and a Group company or another financial institution, or (2) is a party to a joint marketing agreement with a Group company that protects your Customer Information and prohibits the nonaffiliated party from using the information for any other purpose.

We may also disclose Customer Information pertaining to past and current members and customers in connection with legal proceedings as permitted by law, such as responding to a subpoena. This is done on a strictly confidential basis to the extent permitted by law.

## Business Disruption Policy

The Group has developed and implemented a Business Continuity Plan in order to ensure our customers' assets and accounts are accessible in the event of a Significant Business Disruption (SBD). With respect to maintaining each Group company as a continuing business in the face of significant business disruptions, it is the policy of the firm's management to respond to an SBD by first safeguarding employees' lives and firm property, protecting all of the firm's books and records, making a financial and operational assessment and quickly recovering and resuming operations to allow our customers the ability to transact business and for the firm to provide customer services. In the event that we determine we are unable to continue our business, we will notify our customers and advise them of alternative procedures to access their funds. At MEA Financial Services and its affiliates, all our customers have independent access to their funds and account information through available websites and telephone connections of the specific company where the customer's funds are invested. Such access permits account verification by the customer independent of the Group.

In the event of an SBD, we will implement immediate customer notification procedures that provide alternate communication arrangements. This

information will be posted on Paradigm's website ([www.meafs.com](http://www.meafs.com)) and Fairway Investment Group's website ([www.fairwayinvestment.com](http://www.fairwayinvestment.com)). Status information messages will be recorded on a special "hot line" phone connection (800-292-1950). In the event of a more serious SBD, the aforementioned procedures will be supplemented with general radio announcements, and if necessary newspaper announcements.

## Security Standards

We continue to review and analyze new technology to evaluate its effectiveness in providing additional security for your Customer Information. We safeguard your information in compliance with federal standards and established security practices and procedures. The security measures we employ include implementation of physical, electronic and procedural safeguards.

## FINRA BrokerCheck Program

Paradigm Equities, Inc. is a registered member of the Financial Industry Regulatory Authority (FINRA). FINRA has a BrokerCheck program which allows the public to obtain current regulatory information about FINRA member firms and registered representatives.

An investor brochure containing information about this program is available from FINRA. For a description of this program, contact FINRA through its BrokerCheck hotline number at 800-289-9999 or through its website [www.finra.org](http://www.finra.org).

## SIPC Information

The Securities Investor Protection Corporation (SIPC) was created in 1970 as a non-profit, non-government, membership corporation funded by member broker-dealers. Its primary role is to return funds and securities to investors should the broker-dealer become insolvent. You may obtain information about SIPC, including the SIPC brochure, by contacting SIPC at 202-371-8300 or on the web at [www.sipc.org](http://www.sipc.org).