

## NOTICE CONCERNING YOUR PRIVACY & ONLINE SERVICES

At Phillip Capital Inc. and its affiliates (collectively, “PCI”), maintaining client trust and confidence is a high priority. We understand that you are concerned with how we treat nonpublic personal information (“Client Information”) that we obtain from you or from other sources about you in the course of providing you with our products and services. For this reason, we want you to understand how we work to protect your privacy when we collect and use information about you, and the steps we take to safeguard that information.

**SECURITY PROCEDURES:** PCI restricts access to Client Information about you to:

- Those of our employees and affiliates who need to know that information in order to provide the products and services you receive from us.
- Those unaffiliated brokers who have introduced you to us (“Introducing Brokers”).
- Those unaffiliated third parties whose access to such information is permitted or required by law and who need to know that information in order to assist us in providing you with the products and services you receive from us.

To protect the security of Client Information, we maintain physical, electronic, and procedural safeguards that comply with federal standards for guarding the information we collect about you.

**INFORMATION WE COLLECT:** In providing you with financial products and services, PCI may collect the following types of Client Information:

- Information we receive from your Introducing Broker or from you on account applications, whether written or electronic, or on other forms. This information would include your name, address, Social Security number, income, investment experience, and so forth.
- Information about your transactions with us, our affiliates, or others. This information could include your trading through us, our affiliates, and others, your history of meeting margin calls, and your use of the various products and services that we and our affiliates provide.
- Information about your creditworthiness, credit history, and other information about you that we receive from consumer reporting agencies, our affiliates, your Introducing Broker, or providers of other demographic information, such as your purchasing or investment preferences.
- Information about you obtained in connection with our efforts to protect against fraud or unauthorized use of your account(s) with us.

**CATEGORIES OF PARTIES TO WHICH WE MAY DISCLOSE:** PCI does not disclose non-public personal information about its clients or potential clients to non-affiliated third parties, except as permitted by law. For example, we may share non-public information with the following:

- Financial service providers, such as Introducing Brokers, broker-dealers, futures commission merchants, investment companies, investment advisors, commodity trading advisors, and commodity pool operators.
- Other non-affiliated third parties as permitted or required by law, such as in response to a subpoena or legal process or in order to complete a transaction that you initiated and authorized.

**ONLINE SERVICES:** To better serve you, our products and services are described and, in many cases, available through our website, [www.phillipcapital.com](http://www.phillipcapital.com). When accessing this website, please read the Privacy Statement that appears there. Our website Privacy Statement provides important information relating to your use of the website, including information regarding our use of “cookies” and the types of information we collect when you access our website.

If you register for our online products or services, we retain your user ID and password and other information about your use of the website in order to recognize you as a registered user. We may obtain your email address from you or from another source. We may send you email offers for our and our affiliates’ products and services. We may also send you emails for third-party products and services we think may be of interest to you. All email offers we send to you include an opportunity to opt out of future email offers.

If you opt out of receiving email offers, we may still send (via email or otherwise) important information about your account(s) with us and our products and services.