



# PRIVACY POLICY

## CAPITAL STREET GROUP INVESTMENT SERVICES INC. PRIVACY POLICY

Preserving trust is a core value. We recognize that you expect us to protect the information you provide us and to use it responsibly.

We are strongly committed to fulfilling the trust that is the foundation of your expectations. For that reason, we have adopted and adhere to the following policy regarding the privacy of your nonpublic personal information and personally identifiable information (collectively “Nonpublic Personal Information”).

### A. INFORMATION THAT WE COLLECT

We may collect Nonpublic Personal Information from you or others, including your name, address, e-mail address, telephone numbers, social security number, other information that permits us to contact or communicate with you, information about your financial situation including your employment or occupation, salary, assets, insurance and investment transactions, banking information, and other financial and tax information you may elect to supply to us.

### B. HOW WE COLLECT INFORMATION

We collect this Nonpublic Personal Information through various sources, including:

- Information we receive from you on KYI forms, subscription agreements, new account forms, and other forms;
- Information we receive from you, in writing, electronically, through the telephone, or through our website, when you communicate with us, or request information about our products and services;
- Your transactions with us, our affiliates, and those product sponsors with whom we have selling agreements or other arrangements for the provision of services to you;
- Consumer reporting agencies; and
- Affiliated and unaffiliated product sponsors with whom we have selling relationships and whose products you own.

### C. INFORMATION THAT WE DISCLOSE

As permitted by law and as outlined in this policy, we disclose a portion of this Nonpublic Personal Information, your Nonpublic Personal Contact Information and your accreditation status, to affiliates and unaffiliated third parties that provide services to us or with whom we have relationships in order

that we may carry out your directions to effectively and efficiently service your account. Nonpublic Personal Contact Information means: your full name, address, phone number and email. We do not share information other than your Nonpublic Personal Contact Information and your accreditation status.

Examples of third parties with whom we may share your Nonpublic Personal Contact Information include:

- Issuers of securities, both public and private companies, in which you have expressed an interest in investing;
- Clearing Agencies or other broker/dealers through whom we clear and settle your securities transactions;
- Companies providing account performance and/or reporting services on your accounts;
- Third party asset managers (including fund managers) with whom we have relationships for the management of customer accounts or investments;
- Banks and other financial institutions where our Representatives are located and with whom we have arrangements for the marketing and sale of our products and services;
- Companies that provide services to us to assist with the maintenance of books and records required by government and regulators or to facilitate client mailings or publications on our behalf;
- State, Federal, and other regulatory and self-regulatory authorities as required by law or regulation;
- Other companies, associations, agencies, third parties, and institutions that provide non-marketing services to us in order that we may more effectively and efficiently service your account; and those companies, associations, agencies, third parties, and institutions with which we or our Representatives are licensees, registrants, or Members; and
- Except under the circumstances outlined above, we will not share Nonpublic Personal Information or accreditation status with affiliated or unaffiliated third parties concerning our current or former customers for marketing purposes or otherwise.**

#### D. STEPS WE TAKE TO PROTECT YOUR INFORMATION

We have security policies and procedures reasonably designed to prevent unauthorized use or access to your Nonpublic Personal Information. In addition to your Representative and his or her office, your information is available to employees for various business purposes, such as processing or servicing transactions, and those fulfilling compliance, legal or audit functions. Our computer systems utilize password protection to prevent access by unauthorized personnel, and we employ other physical, electronic, and procedural safeguards to ensure the protection of your Nonpublic Personal Information in accordance with state and federal privacy regulations.

#### E. AMENDMENTS TO OUR PRIVACY POLICY

When we make material amendments to our Privacy Policy we will post an appropriate notice on our website. In addition we may send you an amended version of our Privacy Policy through the mail.