



PRIVACY POLICY

WHAT DOES UCAP DO WITH YOUR PERSONAL INFORMATION?

WHY? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

WHAT? The types of personal information we collect and share depend on the product or service you have with us. This information can include: Social Security number and account transactions, Investment experience and account balances, Income and assets.

HOW? All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons UCAP chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does UCAP share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to	No	N/A
For joint marketing with other financial companies	No	N/A
For our affiliates’ everyday business purposes - information about your transactions and experiences	No	N/A
For our affiliates’ everyday business purposes - information about your creditworthiness	No	N/A
For our affiliates to market to you	No	N/A
For non-affiliates to market to you	No	N/A

To limit our sharing call (646) 809-3600.

Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions? Call (646) 809-3600.

- 1. Who is providing this notice?** UCAP Securities LLC and UCAP Asset Management LLC,
- 2. How does UCAP protect my personal information?** To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Also, we only allow employees, authorized service providers and other parties as required or permitted by law to access your information.
- 3. How does UCAP collect my personal information?** We collect your personal information, for example, when you: Open an account with us, make deposits in accounts or withdrawals from accounts, give us your income information or employment history. We collect your personal information from others, such as credit bureaus or certain other companies.
- 4. Why can’t I limit all sharing?** Federal law gives you the right to limit only: Sharing for affiliates’ everyday business purposes – information about your creditworthiness, affiliates from using your information to market to you, sharing for non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.

5. What happens when I limit sharing for an account, I hold jointly with someone else? Your choices will apply to everyone on your account.

DEFINITIONS

Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies.

Non-Affiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Joint marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Do Not Call Policy: This notice is the Do Not Call Policy of UCAP and its affiliates under the Telephone Consumer Protection Act. We do not solicit via phone numbers listed on the state or federal Do Not Call lists, unless the law permits. Consumers who ask not to receive telephone solicitations from UCAP will be placed on the Do Not Call list and will not be called in any future solicitations, including those of UCAP affiliates. If you communicate with us by telephone, we may monitor or record the call.

Special Notice for Nevada residents only: We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by following the directions in the "Can you limit this sharing" section by choosing to limit sharing "For our affiliates to market to you." Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; Phone number: (702) 486-3132; e-mail: BCPINFO@ag.state.nv.us. UCAP, 1200 Brickell Ave. Suite 501, Miami, FL, 33131; Phone Number (646) 809-3600; e-mail: Click on "Contact Us" at the bottom of www.unioncapitalgroup.com.

Special Notice for Vermont residents only: In accordance with Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, except as permitted by law, such as with your consent, to service your accounts or to other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with your authorization or consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

For California residents only: If you are a California resident and we share information with affiliates, or if we have entered into joint marketing agreements with non-affiliated financial companies, we have separately mailed you a California Privacy Notice. If you do not want us to share your information with such companies, please let us know by simply calling the toll-free telephone number provided, using the Web address provided, or completing the reply form contained in the California Privacy Notice and mailing it to the address provided. If you are a new customer, we can begin sharing your information 45 days from the date we sent this notice.

We may collect personally identifiable information from online customers when those customers choose to enter their personal information while using our web site. This information includes, but is not limited to, customer names, e-mail and mailing addresses, phone numbers, and social security numbers. We do not collect personally identifiable information from general online site visitors unless those consumers unilaterally opt to provide personally identifiable information to us. We also do not share personally identifiable information with third-party persons or entities unless authorized by the customer.

As stated above, we do not collect personally identifiable information about individual consumers unless those consumers choose to provide such information. We are aware that some internet browsers have incorporated Do Not Track ("DNT") features. Most of these features, when turned on, send a signal or preference to the web sites you visit indicating that you do not wish to be tracked. Because we do not collect personally identifiable information unless the online customer voluntarily submits it, and because of a lack of industry standard, we do not currently respond to DNT signals, whether on its web sites or other online services.

We may change this privacy policy at any time, and any changes or updates will be effective 30 days after the date of posting. For a current version, please visit www.unioncapitalgroup.com