

## RED Capital Markets, LLC Privacy Policy

### INTRODUCTION

RED Capital Markets, LLC ("RCM") has adopted a Privacy Policy which is provided to customers at the time a new account is opened. Notice is also sent to all customers on an annual basis. The Privacy Policy explains the Firm's policies regarding safeguarding of customer information and records and whether RCM shares information with outside parties. RCM also publishes its Privacy Policy on its web site.

SEC Regulation S-P ("Privacy of Consumer Financial Information") applies only to accounts for individuals (i.e., institutional accounts are not affected) and differentiates between "customers," where RCM has an established relationship with the individual, and "consumers," where there is no pre-established relationship. For purposes of this section, any individual from whom information is obtained (and their legal representative acting on their behalf) to open an account or to obtain services or products from RCM is considered a "customer." The term "consumer" will be considered synonymous with "customer" for purposes of this section.

The Privacy Policy applies to all individual customers of RCM, whether U.S. residents or foreign residents.

### PUBLIC VS. NON-PUBLIC FINANCIAL INFORMATION

Generally, information provided to RCM by a customer or potential customer in the normal course of RCM offering a product or service is considered "nonpublic personal information." Identifying whether information is "public" or "nonpublic" is important as to RCM's obligations if RCM shares information with nonaffiliated third parties. Public information is information that RCM reasonably believes may be obtained from three sources:

- federal, state or local government records;
- widely distributed media; or,
- disclosures to the general public that are required to be made by federal, state, or local law.

Nonpublic personal information also includes any list, description, or other grouping of customers (and publicly available information about them) that is derived from financial information that is not publicly available.

### ANNUAL NOTIFICATION

On an annual basis, RCM will provide all customers with notice regarding RCM's Privacy Policy.

## AFFILIATE MARKETING

Regulation S-AM limits use of certain information received from RCM's affiliates to solicit a consumer for marketing purposes. Consumers may block the use of certain financial information by affiliates of the person the consumer does business with. RCM may use "eligibility information" (i.e., certain financial information such as information regarding the consumer's transactions or experience with the affiliate) if:

- the potential market use of the information has been clearly, conspicuously, and concisely disclosed to the consumer;
- the consumer has had been provided with with reasonable opportunity to opt out; and
- the consumer has not opted out.

RCM will only use information from affiliates if the above requirements are satisfied. Opt-out notices under Regulation S-AM may be included with Regulation S-P opt-out notices described above.

If you have any questions regarding RCM's Privacy Policy, please contact your Account Representative