

## PRIVACY NOTICE

We value your trust and are committed to the responsible management, use and protection of your nonpublic personal information. This Privacy Notice (“Notice”) describes how we collect, disclose, and protect your nonpublic personal information. We provide this Notice when you open your account with us, and at least once every year as long as you remain our client. If our Notice changes, we will send you a copy of the updated Notice at that time.

In this Notice, “you” means you, the client or prospective client. “we,” “our” and “us” refers to GFG Capital, LLC.

“*Nonpublic personal information*” means information:

- You provide to us to obtain a financial product or service, such as your name, address, tax identification number and listing of financial assets;
- About you resulting from a transaction involving a financial product or service between you and us, such as your account balance, and parties to transactions;
- We otherwise obtain about you in connection with providing a financial product or service to you.

### WHAT INFORMATION WE COLLECT:

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

### WHAT INFORMATION WE DISCLOSE:

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors, as applicable; or (iv) as otherwise provided by law.

We may also share certain eligible information with our affiliates for purposes of providing additional financial services. You may limit our affiliates from marketing their products or services to you based on information that we share with them, such as your income and account history. Your decision to limit marketing offers from our affiliates will apply for five (5) years. Once that period expires, you will be allowed to extend your decision. This limitation does not apply in certain circumstances, such as if you currently do business with one of our affiliates or if you ask to receive information or offers from them.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide our products or services to you. Employees who violate our privacy policy will be subject to discipline, which may include termination of employment. We also maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

We may disclose all of the information we collect, as described above, in the course of providing our services to you (such as to complete financial transactions ordered by you) and also to offer you products or other services that we feel may be of benefit to you (such as offering you other financial products).

We will maintain the confidentiality of your information in accordance with this policy should you choose in the future to discontinue your relationship with GFG Capital, LLC.