



PRIVACY NOTICE

GUIDING PRINCIPLES

Alpha Omega Capital Securities, LLC. (“AOCS”) places a high value on the relationships we have with our clients and prospective clients. We strive to maintain our clients’ trust and confidence in our company, an essential aspect of which is our commitment to protecting their personal information to the best of our ability. We believe that our clients and prospective clients value their privacy, so we have established this Privacy Notice to help us ensure that information about our clients and prospective clients will be handled in an appropriate manner. As a general rule, we will not disclose your personal information to anyone outside of AOCS unless you consent, it is necessary to enable us to provide you with our products or services, or it is otherwise permitted by law. In addition, all such disclosures will be made in accordance with this Privacy Notice.

WHY YOU HAVE RECEIVED THIS NOTICE

The reason you have received this notice is that you are either a current AOCS client, or you have contacted AOCS about certain products or services that we provide. This notice describes our practices and policies concerning how we handle information about you.

THE PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN, AND DISCLOSE

AOCS collects and maintains your personal information so we can provide investment management services to you. The types and categories of information we collect and maintain include personally identifiable financial information about you that we obtain in connection with providing financial products or services to you, including:

- Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, and financial information);
- Information that we generate to service your account (such as trade tickets and account statements);
- Information about your transactions with us; and

- Information that we may receive from third parties with respect to you or your account (such as information from consumer reporting agencies).

CATEGORIES OF NONPUBLIC PERSONAL INFORMATION DISCLOSED

We do not disclose any nonpublic personal information about you or our former customers to anyone, except as permitted by law.

CATEGORIES OF NONAFFILIATED THIRD PARTIES TO WHOM NONPUBLIC PERSONAL INFORMATION IS DISCLOSED

In order to assist us in servicing your account, there are a number of nonaffiliated third parties to which we currently provide nonpublic personal information. These parties may include financial service providers (such as companies that perform services on our behalf), non-financial companies (such as our technology consultants who assist us in maintaining our computer systems or entities that assist us in mailing your account materials to you), and other nonaffiliated third parties to whom disclosure of nonpublic personal information is permitted by law (such as the Internal Revenue Service for tax purposes).

CATEGORIES OF INFORMATION ABOUT FORMER CLIENTS THAT ARE DISCLOSED TO NONAFFILIATES

If you choose to close your account(s) or become an inactive client, we will adhere to this Privacy Notice with respect to your nonpublic personal information. Nonpublic personal information about former AOCS clients will not be treated any differently than information about our current clients.

CATEGORIES OF NONAFFILIATED THIRD PARTY SERVICE PROVIDERS AND JOINT MARKETERS TO WHOM NONPUBLIC PERSONAL INFORMATION IS DISCLOSED

We may have various relationships and agreements with nonaffiliated financial institutions with which we may have joint marketing agreements and with various nonaffiliated third party service providers who perform marketing services on our behalf. We reserve the right to disclose to such third party service providers and joint marketers all nonpublic personal information described in this Privacy Notice that we may generate or otherwise collect to the extent permitted by law.

HOW WE PROTECT OUR CLIENTS' PERSONAL INFORMATION

To fulfill our privacy commitment at AOCS, we have instituted firm-wide practices to safeguard the information that we maintain about our clients. These practices include:

- Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep our clients' personal information safe;
- Limiting access to personal information to those employees who need it to perform their job duties;
- Requiring third parties that perform services for us to agree by contract to keep personal information strictly confidential; and
- Protecting information of our former clients to the same extent as our current clients.

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