

ADVANCED REGULATORY COMPLIANCE LLC

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Advanced Regulatory Compliance LLC ("ARC").

Information We Collect: In connection with providing compliance services, we obtain non-public personal information about you, including:

- Information we receive from you during our initial client intake and subsequent contacts, such as your address, date of birth, Social Security Number, occupation, business goals and assets under management;
- Information about your transactions with us, our affiliates, or others;
- Information about your visit to our website. We store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the information electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user's experience.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. ARC does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at ARC, except under the following circumstances:

- To entities that perform services for you or function on your behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other investment advisers;
- To consumer reporting agencies,
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to us for a number of purposes such as protecting your accounts/non-public information from unauthorized access or identity theft;

Cookies: Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive. Our website does not use these "cookies" to collection information. You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our website.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Cyber Security: Internal policies and procedures are in place to address cyber security.

Your Right to Opt Out: Federal privacy laws give you the right to restrict some sharing of your personal financial information. These laws balance your right to privacy with ARC's need to share information for normal business purposes. You have the right to opt out of some information sharing with companies that are (1) Part of the same corporate group as our company (or affiliates); or (2) Not part of the same corporate group as our company (or non-affiliates). Choosing to restrict the sharing of your personal information will not apply to (1) Information about you to firms that help promote and market the company's own products or products offered between two companies; (2) Information about you in response to a court order; and (3) Your payment history on loans and credit cards to credit bureaus. If you opt out, you limit the extent to which ARC can provide your personal information to non-affiliates.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Patrick Burns at Advanced Regulatory Compliance LLC, 8383 Wilshire Boulevard, Suite 950 Beverly Hills, CA 90211; (310) 275-7300.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Advanced Regulatory Compliance LLC, 8383 Wilshire Boulevard, Suite 950 Beverly Hills, CA 90211; (310) 275-7300.