

In opening and servicing customer accounts, Brean Capital, LLC needs to collect certain kinds of personal information – identifying information (such as your name, address, telephone number, and Social Security number), application information (such as information about your assets, income, investment goals, and risk preferences), and transaction information (such as account activity information). Brean Capital will use personal information in ways that are in accord with the purposes for which we originally requested it. For example, we will use the information you give us to process your requests and transactions, to provide you with additional information about products and services, or to evaluate your financial needs. We may share this personal information with a Brean Capital agent or affiliate, or Brean Capital's clearing firm. We limit the collection and use of personal information to what is necessary to administer our business and to deliver superior service to you. This may include advising you about our products or services, those of our affiliates, and other opportunities that we believe may interest you. Brean Capital will not share personal information with others except as stated in this policy, unless we give you additional notice or ask for your permission.

Brean Capital reserves the right to disclose or report the personal information in certain circumstances: (1) to Brean Capital's clearing firm, as Brean Capital deems necessary or appropriate, to handle, process and clear transactions in accounts; (2) where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities; (3) to perform necessary credit checks or collect or report debts owed to us; (4) to protect our rights or property; (5) to engage in the sharing of information with other financial institutions or associations of financial institutions regarding individuals, entities, organizations, and countries, as permitted by section 314(b) of the USA PATRIOT Act of 2001 (Public Law 107-56) and implementing regulations of the Department of the Treasury, Financial Crimes Enforcement Network (31 CFR 103.110); or (6) upon reasonable request by a mutual fund or relating to other investments in your account.

Brean Capital does not sell its customers' or potential customers' personal information. Brean Capital will protect the confidentiality of any personal information you share with us. Brean Capital corporate policies require that employees with access to confidential customer information may not use or disclose the information except for business use. All employees are required to safeguard such information. Brean Capital strives to improve our efforts to protect personal information and makes every effort to keep your personal information accurate and up to date. If you identify any error in your personal information or need to make a change to that information, please contact us and we will promptly update our records. If you have any questions or concerns, please contact the Compliance Department at (212) 702-6500.

Brean Capital, LLC. Member of FINRA and SIPC.