

In opening and servicing customer accounts, Brean Capital, LLC needs to collect certain kinds of confidential information – identifying information such as articles of incorporation, partnership agreements, taxpayer identification forms, names of beneficial owners, direct and indirect and financial and contact information. We will use this information in ways that are in accord with the purposes for which we originally requested it; to process your requests and transactions, to provide you with additional information about products and services, or to evaluate your financial needs. We limit the collection and use of confidential information to what is necessary to administer our business and to deliver service to you and other opportunities that we believe may interest you. Additionally, pursuant to regulatory rules and regulations, there will be times where certain information will need to be updated in order to continue servicing your account(s). Brean Capital will not share this 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 confidential 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' confidential information. Brean Capital will protect the confidentiality of any and all account information you share with us. We incorporate policies where 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 and we strive to improve our efforts to protect confidential account information and making every effort to keep your information accurate, confidential up to date. If you identify any error in your account's 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.