

## PRIVACY POLICY

**Our Commitment to Your Privacy:** First American Capital and Trading Corporation ("FAC") is committed to protecting the confidentiality and security of information we collect about our customers. We will not share nonpublic information about you ("Information") with third parties outside of our clearing firm(s) without your consent, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it. Our clearing firm(s) should have an additional separate privacy policy, which explains their privacy practices.

**Why We Collect and How We Use Information:** We limit the collection and use of Information to the minimum we require to deliver superior service to you. Such service includes processing transactions requested by you and administering our business.

**How We Gather Information:** We get most Information directly from you, when you apply for, access and use financial products and services offered by FAC and its business partners - whether in person, by telephone or electronically. We may verify this information or get additional information from consumer reporting agencies or public sources. This Information may relate to your finances, employment, avocations or other personal characteristics, as well as transactions and interactions with us, our affiliates, or others.

**How We Protect Information:** Our employees are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so, such as to administer our products or services. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with all applicable laws. Employees who violate our Privacy Policy are subject to disciplinary process.

**Disclosure of Information:** We do not disclose any nonpublic information about our customers or former customers to anyone, except as permitted by law. We may disclose any Information to or as directed by our clearing firm(s) or when we believe it necessary for the conduct of our business, or where disclosure is required or permitted by law. Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help us prevent fraud. In addition, we may disclose Information to affiliated and non-affiliated third party service providers (i) to enable them to provide business services for us or our clearing firm, such as performing computer related or data maintenance or processing services, (ii) to facilitate the processing of transactions requested by you, (iii), to assist us in offering products and services to you or to assist our clearing firm in offering products and services to you, or (iv) for credit review and reporting purposes. Except in those specific, limited situations, without your consent, we will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company. It is FAC's policy to require all third parties, other than our clearing firm(s) and affiliates that are to receive any Information to sign strict confidentiality agreements.

**Former Customers:** Even if you are no longer a customer, our Privacy Policy will continue to apply to you.

**To Whom This Policy Applies:** This Privacy Policy applies to products or services provided by FAC to its customers.

**Access to and Correction of Information:** If you desire to review any file we may maintain for your personal Information, please contact us. If you notify us that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Information. Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available.

**Further Information:** We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with a recently enacted federal law and new SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.