

PRIVACY NOTICE

FACTS

WHAT DOES MILITELLO CAPITAL DO WITH YOUR PERSONAL INFORMATION?

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| Why? | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social security number, full legal name, home address, e-mail address or telephone number • Net worth, financial condition, creditworthiness or marital status • Account transactions and account balances <p>When you are <i>no longer our client</i>, we continue to share your information as described in this notice.</p> |
| How? | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Militello Capital chooses to share; and whether you can limit this sharing. |

| Reason we can share your personal information | Does Militello Capital share? | Can you limit this sharing? |
|---|-------------------------------|-----------------------------|
| For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes — to offer our products and services to you | No | We do not share |
| For joint marketing with other financial companies | No | We do not share |
| For our affiliates' everyday business purposes — information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes — information about your creditworthiness | No | We do not share |
| For our affiliates to market to you | No | We do not share |
| For nonaffiliates to market to you | No | We do not share |

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| Questions? | Call (703) 348-0156 or go to www.MilitelloCapital.com |
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Who we are

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| Who is providing this notice? | Militello Capital |
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What we do

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| How does Militello Capital protect my personal information? | <p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include:</p> <ul style="list-style-type: none"> • Maintaining physical, electronic and procedural safeguards to keep your personal information safe. • Limiting access to personal information to Militello Capital personnel who need it. • Proper destruction and disposal of client documents and office equipment. • Taking the appropriate steps to ensure that third parties that perform services for us agree to keep your personal information secure and confidential. • Protecting the personal information of our former Clients to the same extent as our current Clients. |
| How does Militello Capital collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • complete a subscription agreement • provide personal information or give us your contact information • make a wire transfer |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes — information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |

Definitions

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| Affiliates | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Militello Capital affiliates include MC Advisory Services, Piedmont Investment Advisors, Piedmont Numismatics and certain other affiliated companies. (For a complete list of Militello Capital's affiliates, please contact Militello Capital at (703) 348-0156.) |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Nonaffiliates we share with can include financial companies such as custodians, financial advisers and third party administrators. |
| Joint marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Militello Capital doesn't jointly market. |