

# American Capital Advisory, LLC

## Privacy Policy

January 2012

American Capital Advisory, LLC, (“ACA”), respects and is dedicated to protecting the privacy of its clients. ACA pledges to maintain a client’s trust and confidence and will continue to safeguard the confidentiality of the information entrusted to us.

### Client Information

The information ACA collects is limited to that which may be useful as we conduct our business and provide services to clients; protect and administer client accounts; comply with all regulatory laws and regulations; and obtain an understanding of a client’s financial needs so that we may provide them with the highest quality of service.

ACA may collect nonpublic, personal information about its clients from the following sources:

- Information provided by clients on applications or other forms used to establish and maintain an account, such as assets and income;
- Information we have obtained at a client’s request;
- Information we may receive from public records and market research;
- Transactional reports, trade confirms, activity reports or statements regarding account asset information from a broker, bank or other financial institution generated in the servicing of a client’s account;
- Financial or asset related information that we may receive from third parties with respect to a client’s account;

### Shared Information

ACA does not sell information or client lists to third parties nor do we share information about any clients or former clients other than described below. In order for ACA to provide investment management services to its clients' we will disclose information in very limited instances as permitted by law, including:

- Disclosures to companies or affiliates who perform services for ACA on a client’s behalf and who are obligated to keep any information we provide them strictly confidential such as vendors we engage to facilitate account reviews; technology consultants who assist ACA in maintaining its computer systems; the client’s broker and account custodian.
- Disclosures to companies as permitted by law, including those necessary to service and process a client’s account transactions; disclosures in connection with subpoenas or other legal processes; disclosures as part of fraud investigations; disclosures in connection with audits and examinations; and disclosures pursuant to your authorization or consent.
- ACA may also mail to its clients, periodic account statements, for accounts with a common mailing address in a single envelope for convenience. This may include other family or related accounts with the same mailing address and is done at the request of the client.

ACA has adopted the following internal policies and procedures to maintain both physical and electronic safeguards in accordance with federal guidelines and legal standards, protecting both client and former client’s nonpublic, personal information from unauthorized disclosure.

- Our office doors are kept locked after 5pm daily
- All client records are maintained in designated file cabinets or in electronic format
- All ACA employees are bound by our Code of Ethics and will access client information for legitimate business purposes only
- All employees are required to shut down their computers each night and have password protected entry into computers housing our client data
- All internal client reports and other confidential information is shredded rather than disposed of in the trash
- ACA educates its employees on the importance of client confidentiality and requires them to sign a client confidentiality agreement
- ACA maintains a firewall restricting the inflow of traffic on our connection to the internet
- No client information is posted on website

This Policy is subject to change and you can request a copy of our current Privacy Notice at anytime by contacting our office.