

PRIVACY PLEDGE TO OUR CLIENTS

The protection of your privacy and respect for it is extremely important to FBB Capital Partners ("FBB"). This pledge describes how we protect the confidentiality of the personal information you share with us, the types of information we collect, and how we use it.

Client Information

The information we collect is limited to that which is useful to conduct our business and to provide services to you; to protect and administer your records, accounts and funds; to comply with regulatory laws and regulations; to help us design or improve our services and to understand your financial needs so we can provide you with superior service. Information comes from the following sources:

- Information obtained when your relationship with us is established and during the course of that relationship.
- Information obtained about your transactions with us or others such as brokerage firms and custodians.
- Information we obtained at your request.

Information We Share

FBB wants you to be fully aware and assured that we do not sell information or client lists to third parties. We do not share information about any clients or former clients other than described below.

Sharing Information with Companies That Work with Us

In order to conduct company business, and to offer products or services that may complement your relationship with us, we may share some or all of the information we collect, as described above, with companies that perform services for us on your behalf, such as the account custodian, auditors, data systems management and other vendors hired to provide support for one or more of our products and services; our and your professional advisors (typically accountants and attorneys); or other management firms we retain to manage a portion of your assets. Written obligations are generally in place to keep the information we provide confidential and to use the information only for the purposes authorized.

Sharing Information in Other Situations

We may share some or all of the information we collect, as described above, or as otherwise authorized or required under applicable law. This includes, for example, disclosures to process and service your requested or authorized 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.

Common Mailings

We may combine periodic account statements or other periodic notices for accounts with a common mailing address in a single envelope. This is commonly known as "householding" and may include other family or related account(s) with the same mailing address. This will be done as requested or consented to by the accountholders.

Protecting Information About You

Within our firm, we restrict access to information about you to those employees who need to know that information as part of their job responsibilities. We also educate our employees about the importance of confidentiality and client privacy. FBB also maintains physical, electronic, and procedural safeguards to help protect your information. We continue to test and update technology to protect client information.

Protecting Information About Our Former Clients

Our Privacy Pledge regarding the collection, use and disclosure of information about former clients is the same as our pledge to existing customers.

We want to Maintain Accurate Information

We recognize we must maintain accurate customer records. For that reason, we have established procedures to maintain the accuracy of your information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner. If you believe our customer records contain incorrect information, call or write to us at the telephone number or address listed on your account statement or other documentation.

Contact Us If You Have Questions About Our Privacy Pledge

If you have questions about this Privacy Pledge, please call us at 1-301-657-8870 from 9A.M. to 5P.M. (EST) Monday through Friday.

Keeping Up to Date with Our Privacy Pledge

This Privacy Pledge is subject to change from time to time. You can always request a copy of our current Privacy Pledge by contacting us at our offices. We will notify you each year about our Privacy Pledge as long as you maintain an ongoing relationship with us.

Miscellaneous Information

This Privacy Pledge applies to individuals who obtain or have obtained from us a financial service that is used primarily for personal or family account purposes. The laws of some states may impose separate requirements regarding particular types of information about clients and disclosure for those respective states. This Privacy Pledge is intended to comply with applicable law and replaces all other notices, statements or agreements with respect to the same subject matter.