

NEW CAPITAL MANAGEMENT, LLC

PRIVACY POLICY

Protecting your privacy is of paramount importance to New Capital Management, LLC (“NCM”). We are providing you with this privacy notice to help you understand how we collect and use your personal information. The following policy serves as a standard for New Capital Management, LLC for collection, use, retention, and security of nonpublic personal information.

What Information Do We Collect?

NCM may collect information about you in connection with providing a financial product or service to you. We may collect information in order to service your account effectively or to meet certain legal and regulatory requirements. Examples of the information we collect includes:

- Information we receive from you on applications, questionnaires and other account-related forms such as name, address, Social Security number and telephone number or other information you provide NCM directly about your finances or personal circumstances;
- Information about your transactions with us or others such as securities purchased and sold, account balances and other account activities; and
- Information we receive from third parties.

To Whom Do We Disclose Your Information?

NCM does not sell your personal information to anyone. We do not disclose any nonpublic personal information about you to anyone, except as permitted or required by law. We are permitted under law to disclose nonpublic personal information about you to third parties in certain circumstances. For example, we may disclose nonpublic personal information about you to third parties to assist us in servicing your account, such as the account custodian.

If you decide to close your account(s) or become an inactive customer, we will continue to adhere to the privacy policies and practices described in this notice.

What Do We Do to Protect Your Personal Information?

We take steps to safeguard customer information. We restrict access to your personal and account information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards to protect your personal information.

Contact Us

If we make any material changes in our privacy policy, we will provide you with an updated notice. Should you have any questions, please contact us at 708-848-7784.