

**PRIVACY POLICY**  
**Capital Markets IQ, LLC**

<b>FACTS</b>	What does Capital Markets IQ, LLC (“CMIQ”) do with Your Personal Information?
<b>WHY?</b>	<p>CMIQ can choose how we share your personal information. Federal law gives you the right to limit some but not all sharing. Further, we are required to tell you how we collect, share and protect your personal information.</p> <p>Please read this policy carefully to understand what we do.</p>
<b>WHAT?</b>	<p>The type of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social security number or Tax ID number</li> <li>▪ Date of birth</li> <li>▪ Income</li> <li>▪ Assets</li> <li>▪ Name and Address</li> <li>▪ Email Address</li> <li>▪ Phone Numbers</li> <li>▪ Transaction history/Investment Activity</li> <li>▪ Account Numbers</li> <li>▪ Personal goals &amp; objectives</li> <li>▪ Account balances</li> <li>▪ Accounts at financial institutions</li> </ul>
<b>HOW?</b>	We need to share your personal information to run our everyday business. Below we list the reasons we may share your personal information; the reasons to share; and whether you can opt-out or limit this sharing.

Reasons we may share your personal information	Does CMIQ Share?	Can you opt-out of this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts or respond to court orders and legal investigations	YES	NO
<b>For our marketing purposes</b> - to offer our products and services to you	NO	We do not share
<b>For joint marketing with other financial companies</b>	NO	We do not share
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	YES	NO
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	NO	We do not share

## What we do

How does CMIQ protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files.
How does CMIQ collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"><li>▪ Enter into an investment management agreement or consulting agreement</li><li>▪ Seek financial advice</li><li>▪ Make deposits or withdrawals from your account</li><li>▪ Tell us about your investment or retirement portfolio</li><li>▪ Give us your employment history</li></ul> <p>We also collect your personal information from your custodians which you have authorized us to receive information from.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"><li>▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness</li><li>▪ Affiliates from using your information to market to you</li><li>▪ Sharing for non-affiliates to market to you</li></ul> <p>CMIQ only shares information in order to process your transactions, maintain your accounts or respond to court orders and legal investigations. We may share with our affiliates in order to provide financial services.</p> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

## Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"><li>▪ CMIQ shares with affiliates as permitted by law and to provide services, but not for marketing purposes unless directed to by you.</li></ul>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"><li>▪ CMIQ does not share with non-affiliates so they can market to you.</li></ul>
Joint Marketing	<p>A formal agreement between non-affiliate financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"><li>▪ CMIQ does not jointly market.</li></ul>

**Massachusetts:** CMIQ has established standards and practices to ensure compliance with the provisions of M.G.L. c.93H and 201 CMR 17.00 relative to the safeguarding of personal information contained in both paper and electronic records for residents of the Commonwealth of Massachusetts.

We disclose our privacy policy on our website. We reserve the right to modify this policy at any time, but if we do change it, we will tell you promptly.

Please contact us via e-mail with any additional concerns / questions at: [legal@capitalmarketsiq.com](mailto:legal@capitalmarketsiq.com)

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