

FACTS

WHAT DOES CAPTRUST DO WITH YOUR PERSONAL INFORMATION?

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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and account balances
- Investment experience and transaction history
- Income and retirement assets

When you are *no longer* our customer, we may continue to share your information as described in this notice.

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 CAPTRUST chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CAPTRUST 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	Yes	No
For joint marketing with other financial companies	No	We don't 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 don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?

Call us at **800-216-0645**.or email legal@captrust.com

Who we are	
Who is providing this notice?	CapFinancial Partners, LLC and its affiliates, including but not limited to CapFinancial Group, LLC, CapFinancial Securities, LLC, CAPTRUST 2022 Homecourt Fund GP, LLC, CFAS, LLC, and Boston Fiduciary Services, LLC (collectively, "CAPTRUST").
What we do	
How does CAPTRUST 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 and buildings. We protect personal information through physical, technical, and administrative safeguards, including encryption, monitoring tools, background screening, access controls, and contractual restrictions on service providers.
How does CAPTRUST collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ■ Open an account or enter into an investment advisory contract ■ Give us your income information or show your government issued ID ■ Seek financial advice <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies. See below for more on your rights under state law.</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"> ■ 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	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ Our affiliates include financial companies such as: CapFinancial Group, LLC, CapFinancial Securities, LLC, CAPTRUST 2022 Homecourt Fund GP, LLC, The Players Group, LLC, CFAS, LLC, and Boston Fiduciary Services, LLC.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ CAPTRUST does not share with nonaffiliates so they can market to you.
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"> ■ CAPTRUST does not jointly market.
Other Important Information	
<p>FOR CALIFORNIA CUSTOMERS: In accordance with California law, we will not share information we collect about California residents with non-affiliated third parties or with affiliates, except as permitted by California law.</p> <p>FOR NORTH DAKOTA CUSTOMERS: We will not disclose nonpublic personal information to any nonaffiliated third party, except as otherwise permitted by law.</p>	