CAPULENT

Privacy Policy

Protecting Your Privacy. Earning and keeping your trust is at the core of our business. We are committed to protecting the personal and financial information you've entrusted to us. In accordance with federal privacy regulations, we would like to share with you the principles and policies that we use to ensure the privacy of your information.

Our Pledge To You. While information plays a large role in our ability to provide superior service, we know that our most important asset is our customers' confidence in us. Keeping information secure, and using it only as our customers would want us to, are matters of principle. With this in mind, here is our pledge to each and every customer. We will:

1. Respect the trust you place in us and the confidential nature of the information you provide through your financial relationship with us.
2. Limit the collection and use of customer information to what we believe would be useful to service your accounts, administer our business, or tell you about our services.
3. Restrict employee access to customer information to those who need to know in order to provide services to you.
4. Educate our employees to reinforce the importance of confidentiality and customer privacy.
5. Maintain appropriate security standards and procedures to protect information about you.
6. Respond quickly to your request to correct inaccurate information.

You can count on us to protect the privacy of the information you have entrusted to us and to provide you with the responsive, professional service you deserve.

Information We Collect. The information we collect and maintain about you comes primarily from you during the course of establishing and maintaining your account. This information, not available publicly, comes from the following sources: information you provide to us when you fill out account opening documents, complete a form, or make a request for services; information from your transactions with us; and, information obtained from others.

How Information Helps Both You and Us. Our mission is clear: to help you reach your financial goals. Information about you and your accounts plays a key role in our ability to succeed in this mission. It also helps us service your accounts and administer our business. For example, we use information about you to: respond more accurately and efficiently to your requests; identify opportunities to give you more convenience and control by developing new services that may benefit you; and, keeping Information safe. We limit access to the information we have about you to those employees who need to know to provide you with services to help you meet your goals. We maintain appropriate physical, electronic and procedural safeguards to protect your information.

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The Importance of Being Accurate. To succeed in our mission, we recognize that we must maintain accurate customer records and, therefore, have established standards and procedures to keep such information secure, current, and complete. If you ever discover inaccuracies in our data or if your information changes, we urge you to notify us immediately.

We Limit The Sharing Of Information. To protect your privacy, we limit the information we share with third parties. We conduct our business with great respect for the confidential nature of the information being provided. We will not share information about you except as outlined below. Sharing Information With Companies Who Help Us Provide You Services We may share the information described under the section captioned “Information We Collect” with external companies to complete a transaction you have requested or to help us service your account. We are highly selective in choosing these companies. All companies with whom we do business are contractually obligated to comply with strict standards regarding security and confidentiality, and the information can be used only for the sole purpose of providing the service we have requested the company to perform.

Sharing Information In Other Situations. We may share the information described under the section captioned “Information We Collect” when we are permitted or required by law. Examples include responding to a subpoena or working with regulators. We also may share this information when authorized by you.

Disclosure of Privacy Principles and Policies to Customers. We recognize and respect your privacy expectations and we want to clearly communicate our commitment to your privacy. If you have any questions about this policy or specific privacy and security procedures, please call us at (800) 255-5181 or email clientservices@capulent.com. Keep in mind that the privacy principles and policies discussed above are for general guidance and do not constitute a contract, create legal rights, or modify any agreements we have with you.

Very Respectfully,

Capulent, LLC
January 1st, 2026