



Capital Management, Inc.

**LEAVITT CAPITAL MANAGEMENT'S
COMMITMENT TO CUSTOMER PRIVACY**

Our Commitment to Privacy

At Leavitt Capital Management, Inc., your privacy is our priority.

From time to time, it will become necessary for us to collect personal information from you and about you and your finances. We will use this information to open your account(s), to process your transactions and to help us provide you with a better level of service. Our relationship with you is our most important asset. We understand that you have entrusted us with your private personal and financial information, and we do everything in our power to maintain that trust. We do not sell your personal information to anyone. Further, we protect the security and confidentiality of the personal information we collect.

Details of our approach to privacy and how your personal information is collected and used are set forth in the Leavitt Capital Management Privacy Policy below.

The Leavitt Capital Management Privacy Policy

The Leavitt Capital Management Privacy Policy (sometimes called the Policy) applies to consumers who are current or former Leavitt Capital Management clients or those who register for one of our services or promotional offers.

Throughout the Policy, we refer to information that personally identifies you or your accounts as "personal information". Our Policy can be stated simply as follows:

- 1. We do not sell your personal information to anyone.**
- 2. We do not disclose personal information to non-affiliated third parties, unless one of the following limited exceptions applies.**
 - We disclose personal information to companies that help us process or service your transaction or account(s), including securities clearinghouses and companies that print and mail your account statements.
 - We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law. For example, these situations may arise to cooperate with regulators or law enforcement authorities, to resolve consumer disputes, to perform credit/authentication checks, or for institutional risk control.

Outside of these exceptions, we will not share your personal information with third parties unless you specifically ask us to do so.

3. We do collect personal information from you in the normal course of business in order to administer your accounts and serve you better.

- Application and registration information. We collect nonpublic personal information about you from information we receive from you on applications, subscription agreements/documents, questionnaires and other forms when you open an account, register for one of our services or when you accept a promotional offer for a Leavitt Capital Management-sponsored product or service. The information we collect may include name, address, phone number, e-mail address, social security number, and information about your interests, investments, and investment experience. We also may collect information from consumer reporting agencies.
- Web site usage. We do not currently use our web site for the purpose of collecting information. If we do decide to obtain information from a web site, we may collect some information through the use of “cookies”. For example, we may identify the pages on our web site that your browser requests or visits.
- Transaction information. Once you have an account with us, to administer your account and better serve you, we collect and maintain personal information about your transactions, including balances, positions, and history, and may include your name or other data in an internal client list that reflects your activities at Leavitt Capital Management.

4. We use your personal information to fulfill our regulatory obligations, to help us deliver the best possible service to you and to alert you to Leavitt Capital Management products and services you may find useful.

5. We protect the confidentiality and security of your personal information.

- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.
- We restrict access to personal information to our employees and agents for business purposes only. All employees are required to safeguard such information. In addition, we educate our employees to understand the importance of confidentiality and customer privacy and require that each employee sign a document acknowledging their obligations of confidentiality.
- We maintain physical and procedural safeguards to guard your personal information. We do not permit any of your personal information to be copied or removed from our premises.

6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.

- If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records.

7. We will provide notice of changes in our information-sharing practices.

If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this Policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt-out of such disclosure.

If you have any questions or concerns regarding Leavitt Capital's Privacy Policy or any other matter, please contact us at 847-205-1300, and ask for Steve Reaven (x 241).

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