Privacy Policy Statement

Revised August 1, 2014

Capital Focus, Inc. (CFI) is committed to safeguarding the personal information that it obtains from you. Preserving this confidentiality and your privacy is of the highest importance to CFI. We have the utmost respect for our clients and hold all personal information provided to us in the strictest of confidence, including information that we collect from you in connection with any of the services we provide.

How We Protect Your Personal Information

A. CFI does not rent or sell your name or other personal information. We only share information with affiliated and non-affiliated third parties, such as clearing and custodial firms and direct investment companies directly related to your transaction, for the purpose of servicing your financial needs. This may include information required to process transactions on your behalf, to conduct our operations, to follow your instructions as you authorize, to market our products and services, and to protect the security of our financial records. We may also disclose certain information as required or permitted under applicable law, for example, to government and regulatory bodies.

B. CFI restricts access to your personal information to those who need that information to service your account or to provide you with our recommendations and services. We share a limited amount of information with our clearing firm in order to execute securities transactions on your behalf, or so that we can discuss your financial situation with your accountant, attorney or other professionals as designated by you.

C. CFI enforces policies and procedures that preserve your privacy. CFI maintains physical, electronic and procedural safeguards to protect the security and confidentiality of your information.

D. The categories of nonpublic personal information that we collect from your account applications and other forms, in interviews or by other means depend upon the scope of the relationship you have with CFI. This may include information about your finances and personal profile (such as social security number, annual income and net worth, investment experience), information about your health to the extent that it is needed for the planning process (for insurance review and needs analysis) and information about transactions between you and third parties (trading history and account balances).

E. CFI shall provide each on-going client with a copy of its privacy policy statement at least once a year unless client has specifically requested to opt out of such routine annual notification in writing. In addition, all on-going clients are provided a copy of CFI's privacy policy statement upon any substantial change in its privacy policy statement.

F. The provisions of this Privacy Policy apply to former clients, as well as current clients.