

ALCOSTA CAPITAL MANAGEMENT, INC. (“ACM”)

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FACTS

WHAT DOES ACM 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: <ul style="list-style-type: none"> • Social security number and assets • Income and risk tolerance • Account transactions and account balances When you are <i>no longer</i> our customer, we 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 ACM chooses to share; and whether you can limit this sharing.

Reasons we can share your information	Does ACM 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 do not 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	We do not collect	We do not share
For our affiliates to market to you	No	We do not share
For non-affiliates to market to you	No	We do not share

To limit our Sharing	We do not currently share your information except as necessary to manage your account or as required by law. Please note: if you are new investor, we can begin sharing your information two days from the date you first receive this notice. When you are no longer an investor, we continue to share your information as described in this notice.
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Questions?	Call 888-267-6729 or email Erick Ormsby, at eo@alcostacapital.com
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What we do	
How does ACM 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.
How does ACM collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> • Complete a client agreement or other forms • Open an account or seek advice about your investments • Request a disbursement or direct us to buy securities
Why can't I limit all sharing?	Federal Law gives you the right to limit only: <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 non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices apply to everyone on your account-unless you inform ACM otherwise in writing.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <p><i>ACM does not currently have any affiliates.</i></p>
Non-affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <p><i>ACM may share personal information with non-affiliated third parties, such as broker dealers, banks and investment advisers for business purposes. ACM may also share personal information with parties who provide technical support, legal counsel, and accounting and compliance professionals.</i></p>
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <p><i>ACM does not currently have non-affiliated joint marketing partners.</i></p>