

R. SEELAUS & CO., INC. PRIVACY POLICY

The following describes how R. Seelaus & Co., Inc. and its affiliates Granite Springs Asset Management LLC, and RSC Financial Products LLC., handle your personal information, and what steps we take to protect your privacy. This policy applies to current and former customers. We do not use your personal information for marketing purposes.

Accessing Information

Access to customer information is authorized for R. Seelaus & Co.'s business purposes only. It is based on our need to know such information to assist your broker in providing products and services to you, or to conduct R. Seelaus & Co. business. R. Seelaus & Co. requires its employees and Pershing LLC (clearing agent) who have access to customer information to protect it and keep it confidential.

Collect Information to Conduct Business

R. Seelaus & Co. collects information about you to help your broker serve your financial needs, provide customer service, offer new products or services, and fulfill legal and regulatory requirements. The type of information that your broker provides to R. Seelaus & Co. varies according to the products or services you request through your broker, and may include:

- Information included on your application and related forms (such as name, address, Social Security number, net worth and income);
- Information about your relationships with your broker (such as products or services purchased, account balances and payment history); and
- Information from visitors to R. Seelaus & Co.'s websites (such as that provided through online forms, site visitor-ship data and online information collecting devices known as "cookies.")

Security Standards

R. Seelaus & Co. continues to assess new technology to evaluate its ability to provide additional protection of your personal information. We safeguard this information in accordance with federal standards and established security standards and procedures. Measures we take in this regard include implementation of physical, electronic and procedural safeguards. Sharing Information In the course of conducting business, we may disclose some or all of the previously described information about you to our clearing agent, Pershing, LLC and other businesses including non-affiliated third parties, as allowed by law, for the purpose of:

- Providing customer service or account maintenance;
- In response to a subpoena, to prevent fraud, or to comply with an inquiry by a government agency or regulator, and
- To perform services for us or on our behalf to develop or maintain software.

If you wish to limit our sharing of information about you as described in this notice, you may do so by contacting us at the below phone number or address.