

North Capital's Commitment to Privacy

Effective Date 11/09/2015

North Capital is committed to protecting your privacy and safeguarding your personal and financial information. The following Privacy Statement explains how North Capital collects, uses and protects your personal information. For the purposes of this Statement, "North Capital" includes North Capital Private Securities Corporation, along with its subsidiaries and affiliates. Independent custodians, brokers, transfer agents, escrow agents, portals and other third-parties generally maintain their own Privacy Policies and are not covered by this Privacy Statement, except as described below. If you have any questions that this Statement does not address, please contact North Capital using the [contact form](#) or at info@norcapsecurities.com. By establishing a relationship with North Capital or by using our websites or the website of any of our subsidiaries or affiliates you give your consent to the collection and use of certain personal information as explained in this statement. Any dispute regarding the Privacy Statement is subject to this notice, the Website Terms of Use, and the terms of any other written agreement between you and North Capital, including arbitration of disputes and limitation of damages.

North Capital has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking on the TRUSTe seal.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.

The TRUSTe certification covers our collection, use and disclosure of information we collect through our websites www.northcapital.com, advisory.northcapital.com, www.PPEX.com, [ww](#)

w.accredited.am, www.ruralgrowth.com, www.99funding.com, www.reitless.com, and our TransactAPI platform. The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged North Capital.

The TRUSTe program does not cover information that may be collected through software downloaded from our websites.

What information does North Capital collect?

North Capital collects and maintains the following personal information required to communicate with you, including your name, mailing address, telephone numbers, and email address. In addition, North Capital requests the following personal information to identify who you are, such as government identification, employer name and address, and Social Security or Employer Identification number. To comply with state and federal laws and regulations, North Capital also collects information to assess your current financial situation, your goals and objectives, and your investment experience, and other factors related to your suitability for certain investments. The information requested may include your approximate annual income, sources of income, approximate net worth, and approximate value of investment assets. If you register through the Website, North Capital may collect certain demographic information, including age, gender, education, occupation, etc. Certain information also is collected automatically, which we store in log files, when you access the Website, including your Internet Protocol (IP) address, browser type, operating system, internet service provider (ISP), pages accessed, and prior and following sites that you view. We do this to improve the services we offer you and to improve site functionality.

What kind of tracking technologies do we use?

North Capital and our partners, affiliates, or analytics or service providers may use tracking technologies such as cookies, beacons, tags, and scripts to analyze

trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies from these companies on an individual or aggregated basis.

We utilize cookies, which are small text files sent from the server to your local computer. Cookies help North Capital by providing operational data that we can use to improve the navigation, usability and content of the Website. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

We use Local Shared Objects, such as Flash cookies to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use Flash cookies or HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5. To manage Flash cookies, please click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html

We partner with a third party to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this website and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Frames: Some of our pages utilize framing techniques to serve content to/from our partners while preserving the look and feel of our website. Please be aware that you are providing your personal information to these third parties and not to North Capital.

Social Media Widgets: Our websites includes Social Media Features and Widgets, such as the Twitter and LinkedIn interactive mini-programs that run on our website. These Features may collect your Internet protocol address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. The privacy statement of the company providing it governs your interactions with these Features.

When does North Capital obtain information about you?

Most of the information collected by North Capital is provided directly by you, by completing the questionnaires and documentation required by North Capital to do business with you. Other ways information may be obtained are by (1) observing your usage of the Website, (2) providing services to you, and (3) collecting information (such as address, occupation, investment risk profile, and other marketing data) available from publicly or commercially available sources, such as online databases We collect this information to help us determine the suitability of products and services for you and to ensure regulatory compliance.

Why does North Capital gather information?

North Capital gathers information about you and your financial situation in order to provide you with services that are appropriate for your particular situation and to ensure compliance with applicable laws and regulations. In addition, North Capital may gather information to help expand the scope and improve the quality of services that North Capital might offer to you now or in the future.

How does North Capital use clients' personal information?

The trust of our clients is our most important asset. North Capital is careful to use personal information only as appropriate to provide clients with premium service while maintaining confidentiality and security. For example, North Capital may use information collected to verify your personal identity and contact details. If the information you provide suggests that other services may be

suitable and appropriate, North Capital may offer additional services to you. North Capital also may use the demographic information collected, along with general demographic information provided by third parties, in order to develop additional capabilities and services for clients. Should you elect to terminate your relationship with North Capital, we may disclose your personal information as required by law, such as, to comply with a subpoena, bankruptcy proceedings, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. We will retain personal data we process on behalf of our TransactAPI clients for as long as needed to provide services to them. North Capital will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

What information may be shared with affiliates, partners, and third-party service providers?

North Capital will share your personal information with third parties only in the ways that are described in this privacy statement. We may share your personal information with affiliates, partners and third-party service providers if the information is required to provide a service you have requested or to provide you the opportunity to participate in the products or services offered by the affiliates. The use of your personal information is limited to the purposes identified in North Capital's agreement with the affiliate, partner or third-party service provider, although you may be asked to agree to additional terms including acknowledging additional privacy terms, as a condition of accepting the provision of services. An affiliate is a company that North Capital owns or controls or is under common control. North Capital may share information related to the services provided to you, such as name, email address, mailing address, date of birth, employment status, and general account and demographic information. North Capital does not share information with affiliates other than the type of information described above. A partner or third-party service provider is a firm contracted by North Capital to support certain functions of the

business, such as transaction posting, information dissemination, internet marketing, account processing, research, due diligence, reporting, information technology support, transfer agency, escrow, or custodial services. Use of any shared information is strictly limited to the provision of the contracted service, and all partners and third-party service providers with whom personal information is shared are required to protect such information in a manner similar to the way we protect such information, including restricting its dissemination except as necessary to provide the contracted service. Within our TransactAPI platform, transfers to subsequent third parties are covered by the service agreements with our TransactAPI clients.

Any personal information that you provide directly to another company that also is a partner or third-party service provider to North Capital will no longer be controlled under our Privacy Statement. North Capital also reserves the right to disclose your personal information to regulatory, law enforcement or other government authorities, and as necessary to protect our rights or property. Notwithstanding the foregoing, North Capital's privacy policy is subject to applicable laws and regulations, including [FINRA](#) regulations, which may impose more stringent requirements than those outlined above. In the case of any conflict between this policy and applicable laws and regulations, the laws and regulations will prevail. If you do not want us to share your personal information with these companies, contact us at info@norcapsecurities.com.

Does North Capital's Privacy Statement apply to other websites linked to the Website?

No. North Capital is not responsible for the privacy policies or the content of sites that link to or are linked to our Websites, and has no control of the use or protection of any information provided by you or collected by those sites. Whenever you follow a URL to a linked Website, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy provided by that third party.

What steps does North Capital take to safeguard clients' personal information?

North Capital utilizes a broad array of security software, systems, and operational procedures to ensure the confidentiality and safety of your personal information. While no security system is flawless, North Capital is regularly reviewing and upgrading the security technology and procedures that safeguard your confidential information. If you access the Website, a unique login identifier and password will be maintained for your online account access. You are responsible for keeping this information secret. You also may be offered online access to information related to your account through a third party service provider, such as an investment portal, advisor, custodian, transfer agent, or escrow agent. In such case you are responsible for safeguarding the credentials provided by such third party.

Will I be able to review, change, delete or correct my information?

Yes. Personal identifying information may be reviewed, changed, or corrected at any time. Your personal information cannot be deleted due to our regulatory compliance obligations. However, if you request that we no longer use your personal information, it will be maintained for regulatory archival purposes only. You are responsible for maintaining the accuracy and completeness of your personal and other information. Please review your information at regular intervals to ensure that it is accurate and complete. If you would like to review your personal information, or request deletion of your personal information, or if you believe that any of the information you have provided may be incorrect or out of date, or if you have any other questions or concerns regarding your personal information or regarding this Privacy Statement, please contact us using the Contact tab or email info@norcapsecurities.com.

North Capital may not have any direct relationship with the individuals whose personal data it processes on TransactAPI. In such instance, an individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should

direct his query to North Capital's client (the data controller). If requested to remove data we will respond within a reasonable timeframe.

Our blog is managed by a third party application that may require you to register to post a comment. We do not have access or control of the information posted to the blog. You will need to contact or log in to the third party application if you want your personal information that was posted to the comments section removed. To learn how the third party application uses your information, please review their privacy statement.

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page, or you can contact us at info@norcapsecurities.com

If you choose to use our referral service to tell a contact about a blog post, we will ask you for your contact's name and email address. We will automatically send your contact a one-time email inviting him or her to visit the blog. North Capital stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program.

Your contact may contact us at info@norcapsecurities.com to request that we remove this information from our database.

How will I know if there are any changes to this Privacy Statement?

In the event that North Capital makes any material changes to this Privacy Statement, the revised Privacy Statement will be posted to the Website along with a notice informing you of such changes. In addition, this Privacy Statement has an effective date displayed at the beginning of this statement indicating when it first came into effect. You should review this Privacy Statement at regular intervals to remain informed of any changes. You agree that the act of posting a

revised Privacy Statement electronically on the Website satisfies any obligation of North Capital to physically deliver the Privacy Statement to you.

Contact us

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[<https://www.northcapital.com/contact/>]