

FACTS

WHAT DOES GLENORCHY CAPITAL 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 possibly share can include:

- Social Security number, date of birth, address, etc.
- Net Worth, Income, tax bracket, etc.
- Account numbers, balances, positions, and transactions

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share some personal information to run their everyday business. In the section below, we list some reasons financial companies can share their clients' personal information; the reasons Glenorchy Capital may share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Glenorchy Capital 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 services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes— information about your transactions and experiences	No	N/A
For our affiliates to market to you	No	N/A
For nonaffiliates to market to you	No	N/A

Questions?

Send an email message to Bradley McFadden at brad@glenorchycapital.net.

Who we are

Who is providing this notice? Glenorchy Capital

What we do

How does Glenorchy Capital 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 physical, electronic, and procedural safeguards. Glenorchy Capital restricts access to your personal information to those employees and authorized agents who need to know that information.

How does Glenorchy Capital collect my personal information?

We collect your personal information, for example, when you:

- Engage in discussions or establish a relationship with us
- Open accounts with third-party custodians with our assistance

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Capitalist Exploits

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other important information

With the aging of the U.S. population, financial exploitation of seniors is a serious and growing problem. Regulators strongly encourage you to provide us with a "trusted contact", someone that you authorize us to reach out to in the event we ever suspect you are the victim of financial exploitation. We could also reach out to this trusted person if we suspect you may be suffering from dementia or other forms of diminished capacity. If you have not already provided us with a trusted contact, please contact us for discussion in this regard.