

## PRIVACY POLICY

In order to maintain and service your accounts, Keystone Capital Corporation will gather and store information about you. This information, collected via the new account application and other account documentation, is critical to open and administer your account. In addition to this collected information, transactions facilitated by you through Keystone Capital Corporation will be kept for reporting purposes and pursuant to Keystone Capital Corporation’s regulatory requirements. To provide superior service to clients, it is necessary for Keystone Capital Corporation to share information with third parties, including its clearing firm, issuers and its transfer agents and/or information agents. This sharing of personal information is carried out on a strictly professional basis and is incidental to servicing your account. Keystone Capital Corporation has received assurances from these third parties that they will not share your personal information. You understand that through the normal course of servicing your account, certain agents and employees may have access to your confidential account information. This may include operations and support personnel, as well as your investment professional. You understand that access to this information is limited and held in the strictest confidence. You understand that information about former customers who do not currently maintain an account relationship with Keystone Capital Corporation is not shared with any outside party. You understand that due to the relationships that Keystone Capital Corporation has with its clearing firm, issuers and its transfer agents and/or information agents, the sharing of information with these financial institutions is critical to servicing your account. Allowing this sharing process to continue uninterrupted will allow you to take full advantage of the value offered by your relationship with Keystone Capital Corporation. If you would like more information about Keystone Capital Corporation’s Privacy Policy, your request should be sent to Keystone Capital Corporation in writing to: Keystone Capital Corporation, Attn: Compliance, 1953 San Elijo Avenue Suite 203, Cardiff CA 92007; by email to [compliance@kccbd.com](mailto:compliance@kccbd.com); or, by telephoning Keystone Capital Corporation at 858-800-4954.

Facts: What does Keystone Capital Corporation do with your personal information?	
<b>Why:</b>	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.
<b>What:</b>	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"> <li>• Social Security number and Account Balances/Transaction History</li> <li>• Assets and Investment Experience</li> <li>• Income and employment information</li> </ul>
<b>How:</b>	All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer’s personal information; the reasons Keystone Capital Corporation chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Keystone Capital Corporation 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 and services with other financial companies	YES	NO
For our affiliates’ everyday business purposes—information about your transactions and experiences	YES	NO
For our affiliates’ everyday business purposes—information about your creditworthiness	NO	WE DON’T SHARE
For our affiliates to market to you	NO	WE DON’T SHARE
For non-affiliates to market to you	NO	WE DON’T SHARE

Who we are	
Who is providing this notice?	Keystone Capital Corporation and the Keystone family of divisions and companies

What we do	
How does Keystone Capital Corporation and its family of companies, 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 Keystone Capital Corporation and its family of companies, collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• open an account or provide account information</li> <li>• give us your income information or give us your contact information</li> <li>• seek advice about your investments or make deposits or withdrawals from your account</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.

Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Our affiliates include Electronic Transaction Clearing, Inc., BNK TO THE FUTURE, Venovate Marketplace, Inc. (CRD 151143, SEC ATS 8-68337)</li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Keystone Capital Corporation does not share with non-affiliates so they can market to you</li> </ul>
<b>Joint marketing</b>	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• Our joint marketing and services partners include the Issuers and its Transfer Agents and/or Information Agents</li> </ul>

Other Important Information	
<b>Information for California, North Dakota, and Vermont Customers</b>	
In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.	

**To limit our sharing:**

- Call 1-858-348-4405—a client services representative will assist you or
- Send an email to [info@kccbd.com](mailto:info@kccbd.com) with the words “opt-out” in the subject line and your Keystone account number in the body copy.
- Visit us online: [kccbd.com](http://kccbd.com)

**Please note:** If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share information as described in this notice. However, you can contact us at any time to limit our sharing.

**Questions?** Call 1-858-348-4405 or email [info@kccbd.com](mailto:info@kccbd.com)