



PRIVACY POLICY

The term "Ascendant", as used herein, shall mean and include any and all subsidiaries, parent or sister corporations, limited liability companies, partnerships or other entities or entity controlling, controlled by or under common control with said company, including, but not limited to Ascendant Capital Markets LLC, Ascendant Capital Partners LLC, Ascendant Capital Group LLC and Ascendant Securities LLC.

The Securities and Exchange Commission has adopted Regulation S-P, privacy rules promulgated under Section 504 of the Gramm-Leach-Bliley Act. Section 504 requires the Commission and other federal agencies to adopt rules implementing notice requirements and restrictions on a financial institution's ability to disclose nonpublic personal information about consumers. Under the Gramm-Leach-Bliley Act, a financial institution must provide its customers with a notice of its privacy policies and practices, and must not disclose nonpublic personal information about a consumer to nonaffiliated third parties unless the institution provides certain information to the consumer and the consumer has not elected to opt out of the disclosure. This notice, in summary form, is intended to tell you where we obtain information about you and who has access to it once it is received by Ascendant.

Information We Collect

We collect information about you to help us serve your financial needs, to provide you with quality services, and to fulfill legal and regulatory requirements. We may collect information about you from the following sources:

- Information we receive from you on applications or on other forms (for example, your name, address, social security number, assets, income, and other household information);
- Information about your transactions and account experience with us or others (for example, your account balance, payment history, parties to transactions); and
- Information that we may receive from a consumer reporting agency (for example, your creditworthiness and credit history).

Information We Share

Ascendant does not sell client information to outside unaffiliated companies. Client information derived from the aforementioned sources may be provided to outside parties under the following conditions:

- To facilitate client business – for example, to complete a transaction on your behalf, or transmission of an account and transactional information to the client's custodian. By agreement, third parties are prohibited from using information about the client beyond its specified purpose.
- As required or permitted by law or regulation – for example, responses to a subpoena, court order or regulatory demand.
- As authorized by the client - clients may, on occasion, direct Ascendant to provide specific information to a third party.

Confidentiality and Security

Ascendant considers its clients and information it receives from clients to be confidential, unless the client states otherwise. Client information will only be handled in the manner described in this notice. Furthermore, Ascendant restricts access to client information to those employees and authorized agents who need to know specific information to effectively deliver products or services to that client. Ascendant has instituted measures to protect confidentiality of client information in compliance with federal standards. Our privacy policy will continue to apply to your information even if your account is no longer active. Ascendant also reserves the right to change this privacy policy at any time.