



AEGIS CAPITAL CORP.

Privacy Policy

Pursuant to Title V of the Gramm-Leach-Bliley Act (GLBA) and the U.S. Securities and Exchange Commission (“SEC”) Regulation S-P (17 CFR 248.1-248.30), we are required to notify you of Aegis Capital Corp.’s (“Aegis”) Privacy Policy.

This disclosure is intended to notify you of the use we make of the non-public financial and personal information we obtain about you while providing brokerage and/or investment advisory services to you. Aegis is a New York corporation with a main office located in New York City, New York.

We are an SEC-registered investment adviser and an introducing securities broker-dealer, with our transactions cleared through other SEC-registered broker-dealers, RBC Clearing and Custody (“RBC”), a division of RBC Capital Markets, LLC, and AXOS Clearing LLC (“AXOS”). RBC and AXOS will deliver their privacy policy under separate cover either electronically or in hard copy. Aegis is registered with the SEC as an adviser and broker-dealer, and our broker-dealer is a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”).

To transact securities business on your behalf, Aegis obtains a variety of non-public financial and personal information about you. In addition, we maintain a record of your securities transactions, which is also non-public. We obtain and maintain records of this information only for the purpose of maintaining the business of being a securities broker-dealer, and in compliance with applicable federal, state and self-regulatory organization rules.

NO SALE OF YOUR NON-PUBLIC FINANCIAL AND PERSONAL INFORMATION

Aegis DOES NOT SELL YOUR NON-PUBLIC FINANCIAL OR PERSONAL INFORMATION.

NON-PUBLIC FINANCIAL AND PERSONAL INFORMATION COLLECTED

The information collected and maintained by Aegis in transacting securities information on your behalf includes, or may include the following types of non-public financial and personal information:

1. **Information from you:** information you provide on new account form(s); whether provided in writing, in person, by telephone, facsimile, via electronic communication or any other means; such as your name, telephone number, address, social security number, tax ID number, assets, income, investment objectives, financial situation, employer, age and previous securities experience.

2. **Information about your securities and other transactions:**

(a) information Aegis collects relates to account(s) balance, payment history, trading activity and any other transactions, which take place through or affect transactions which take place through Aegis; and

(b) information Aegis Capital collects as part of servicing your account(s).

3. **Information about your transactions with non-affiliated third parties:**

- (a) information from non-affiliated third parties pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including documents received, shared, produced or provided in connection with a subpoena, discovery request or other legal process compelling production; and
- (b) information from non-affiliated third parties related to servicing your account(s).

NON-PUBLIC FINANCIAL AND PERSONAL INFORMATION DISCLOSED TO AFFILIATES AND NON-AFFILIATED THIRD PARTIES

Aegis discloses to affiliated and non-affiliated third parties non-public financial and personal information only in connection with the conduct of its securities brokerage business. Such disclosures may include, among other things, information related to transactions, settlement, billing, payment, processing, clearing, transferring, reconciling, collection or tax reporting. Disclosures may be made to affiliates or non-affiliated third parties:

- (1) as required or necessary to carry out fully and properly the securities business conducted by Aegis (e.g. to service providers supplying document processing and delivery, data maintenance or processing services, RBC, AXOS and to non-affiliated clearing agencies or entities);
- (2) as required by law or legal process;
- (3) with your consent;
- (4) to resolve customer disputes;
- (5) when requested by a fiduciary or beneficiary on the account;
- (6) when requested by the client's attorney(s) or accountant(s);
- (7) when required by a regulatory agency or for other reasons required or permitted by law; or
- (8) in connection with a sale or merger of the firm's business.

US Federal Law

US federal law (e.g., Regulation S-P and Regulation S-AM) provides consumers with notice and opt-out rights. We currently collect personal information from you and may share it in connection with: (i) our everyday business purposes (e.g., to process transactions, respond to court orders and legal investigations, etc.); (ii) our marketing purposes (to offer our products and services to you); (iii) our affiliates' for everyday business purposes (e.g., information about your transactions and experiences); and (iv) our affiliates so that they may market to you. We do not currently: (i) share personal information in connection with joint marketing with other financial companies; (ii) share personal information about your creditworthiness (e.g., credit reports) with our affiliates for their everyday business purposes; or (iii) share personal information with non-affiliates for them to market to you.

Under US Federal Law, consumers have the right to limit or "opt-out" of our sharing personal information under certain circumstances. For example, consumers have the right to opt-out of our sharing of personal information with non-affiliated third parties for their marketing purposes. We do not currently share personal information with non-affiliated third parties for marketing purposes, but this notice provides consumers with the right to opt-out of our sharing such personal information in the future. Consumers also have the right to opt-out of our sharing certain personal information (for example, information regarding your credit worthiness like a credit report) with our affiliates. We do not currently share this type of information with our affiliates, but this notice provides consumers with the right to opt-out of our sharing such personal information in the future.

Finally, consumers have the right to opt-out of receiving marketing of products and services from our affiliates based on personal information that we share with our affiliates. This notice provides consumers

with the right to opt-out of receiving marketing communications from our affiliates based on any personal information that we share with our affiliates.

Please contact the Compliance department at compliancedept@aegiscap.com or (212) 813-1010 to exercise your opt-out rights. Your decision to opt-out will remain in effect until you tell us otherwise, and you may change your opt-out status at any time.

FORMER CUSTOMERS

The same protections for non-public financial and personal information of current customers of Aegis apply to information regarding former customers: disclosure is made only as permitted/required by law or legal process or with your consent.

CONFIDENTIALITY AND SECURITY OF NON-PUBLIC FINANCIAL AND PERSONAL INFORMATION

Aegis is committed to implementing and maintaining commercially reasonable and appropriate measures to maintain the privacy and confidentiality of the non-public financial and personal information we collect and maintain about you. Our procedures include: access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals, as well as physical access controls; policies restricting the provision of non-public financial or personal information to anyone other than the customer over the phone; and pre-employment screening, including fingerprinting of all employees with responsibilities for or access to non-public financial or personal information. Aegis regularly reviews and may revise or update its privacy policies and systems at any time, in accordance with changes in technology or legal requirements.

NEVADA RESIDENTS

We are providing you with this notice pursuant to state law. You may be placed on our internal Do Not Call List by calling 212- 813-1010. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; phone number: 702-486-3132; email: BCPINFO@ag.state.nv.us or AgInfo@ag.nv.gov.

VERMONT RESIDENTS

In accordance with Vermont law, we will not share information we collect about Vermont residents with companies that are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

CALIFORNIA RESIDENTS

Except as permitted by law, we will not share personal information we collect about California residents with Nonaffiliates and we will limit sharing such personal information with our Affiliates to comply with California privacy laws that apply to us. Please visit the privacy section of our website (aegiscapcorp.com) for supplemental information concerning California residents and specific rights with respect to our collection, retention, and use of Personal Information.

If you are a California resident visiting our website or in receipt of our services the following supplemental privacy provisions apply to you: [California Consumer Privacy Act Notice](#).