



## **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 Capital) Privacy Policy.

This disclosure is intended to notify you of the uses we make of the non-public financial and personal information we obtain about you in the course of providing brokerage services for you. Aegis Capital is a New York Corporation with a main office located in New York City, New York.

We are an introducing securities broker-dealer, with our transactions clearing through another registered broker-dealer, RBC Clearing and Custody (RBC C&C), a division of RBC Capital Markets, LLC, and AXOS Clearing. RBC Capital Markets LLC and/or AXOS Clearing will deliver their privacy policy under separate cover either electronically or physical statement. Aegis Capital is registered with the SEC and a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC).

In order to transact securities business on your behalf, we obtain 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 Capital DOES NOT SELL YOUR NON-PUBLIC FINANCIAL OR PERSONAL INFORMATION.

### **NON-PUBLIC FINANCIAL AND PERSONAL INFORMATION COLLECTED**

The information collected and maintained by Aegis Capital 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 or 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/or other transactions:

(a) information Aegis Capital collects and 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 Capital; 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 Capital 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 Capital (e.g. to service providers supplying document processing and delivery, data maintenance or processing services, RBC C&C, AXOS Clearing 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.

### **FORMER CUSTOMERS**

The same protections for non-public financial and personal information of current customers of Aegis Capital 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 Capital 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 for insuring this include, at a minimum, the following: – 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. – Pre-employment screening, including fingerprinting of all employees with responsibilities for or access to non-public financial or personal information. Aegis Capital regularly reviews and may revise or update its privacy policies and systems at any time, in accordance with changes in technology or legal requirements.

## **OPT-OUT PROVISIONS**

Since sharing information under the circumstances noted is necessary to service the client account or mandated by competent authority, Aegis Capital does not have any opt-out provisions.

## **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](mailto:BCPINFO@ag.state.nv.us).

## **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.

## **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 ([aegiscap.com](http://aegiscap.com)) for supplemental information concerning California residents and specific rights with respect to our collection, retention, and use of Personal Information.