

PRIVACY PRACTICES DISCLOSURE

Introduction

The Securities Exchange Commission recently enacted Regulation S-P, the “privacy rule” in response to the Gramm-Leach-Bliley Act. This rule requires all investment advisory firms to provide all of its customers and consumers a disclosure statement, outlining the firm’s procedures and policies regarding the safeguarding of “non-public personal information” that is obtained during the normal course of business.

We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust. **Hollencrest has always been committed to maintaining your confidentiality. Our relationship with you is our most important asset.** In our normal course of business, we collect your personal information to open your account(s), to process your transactions and to help us provide better and/or additional services to you. **We do not sell your personal information to anyone.**

The privacy policy of **Hollencrest Capital Management, LLC** (“Hollencrest”) applies to current or former clients or customers and consumers of Hollencrest services, or those who may have registered for one of our services or promotional offers. We refer to “personal information” within the text of our policy to mean nonpublic personal information or financial information that personally identifies you or your account.

Privacy Policy

- **We do collect personal information in the normal course of business in order to administer your account(s) and better serve you. The information we collect may include your name, address, phone number, email address, Social Security number, and information about your interests, investments, and investment experience. Examples of this collection are:** (i) the application and registration information we collected from the data that you provide to us when you open an account, register for one of our services or when you accept a promotional offer for a Hollencrest-sponsored product or service; (ii) collection of information from consumer reporting agencies; (iii) once you have an account with us, to effectively administer your account and better serve you, we collect and maintain personal information about your transactions, including balances, positions, history, and may include your name or other data in an internal client list that reflects your activities with us; (iv) as part of our efforts to reach and service new and existing clients we sometimes collect data and use information from outside mailing lists; (v) we may collect some information on our website. For example, we may identify the pages on our website that your browser requests or visits. This information is only personally identifiable if you have chosen to identify yourself – for example, by opening an account or registering to use our online account access (please review “About Cookies” on your web browser.)
- **Hollencrest has not and does not sell your personal information to anyone.**

- **Hollencrest will use your personal information to fulfill our regulatory obligations and to help us deliver the best possible services to you.** For example, we may use your personal information to provide faster, more convenient services or to alert you to Hollencrest products and services that you may find useful.
- **Hollencrest may not share nonpublic personal information to third parties, unless one of the following limited exceptions applies:** (i) disclosure of personal information, such as account and transaction data, to companies, including financial institutions, which assist us in our clearing responsibilities, compliance or marketing efforts. We have specific contracts with these companies that prohibit them from using your personal information for their own purposes; (ii) disclosure or reporting of your personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law. Examples of this type of disclosure include, but are not limited to: requests from industry (federal and state) regulators or law enforcement, consumer disputes or to perform a consumer background or credit check; (iii) disclosure of your personal information to companies that help us process or service your transactions or account(s); and (iv) disclosure of personal information, such as account and transaction data, to Strategic Third Party Consultants as part of our investment management process. We have specific contracts with these third party consultants that prohibit them from using your personal information for their own purposes. **Outside of these limited exceptions, Hollencrest will not share your personal information with third parties unless you have specifically requested that information be released to them.**
- **We maintain administrative, electronic, physical and procedural safeguards that protect your personal information and confidentiality.** Companies we hire to provide support services are not allowed to use your personal information for their own personal or business related purposes. We limit their use of your personal information to the performance of the special service we have requested or contracted with them to provide to our clients. We limit access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such personal information.
- **Hollencrest continually evaluates our policies and procedures to protect your personal information. We make every effort possible to keep your personal information accurate, current, and confidential.** If you ever identify any inaccuracy in your personal information, or need to update that information, please contact us so that we may promptly change our records and provide you with the best possible services and products.
- **Notice of changes in our information-sharing practices and procedures will be provided to all necessary clients and consumers.** If, at any time in the future, we find it necessary to disclose any of your information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

If you have any questions, comments or concerns, please do not hesitate to contact your personal representative or our administration department at (800) 838-8951. Once again, our relationship with you is our most important asset, and Hollencrest will continually strive to protect your information and provide you with the best service possible.