



# HOLLENCREST

## CAPITAL MANAGEMENT

### REG S-P PRIVACY PRACTICE NOTICE

#### **Introduction**

An important part of the relationship we have with you is the information you share with us. Protecting your privacy is important to us and we want you to know how we treat your non-public personal information.

Pursuant to the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission (“SEC”) Regulation S-P, this notice explains the Privacy Policy of Hollencrest Capital Management (HCM) regarding the privacy interests of our clients. HCM is a registered investment adviser with the SEC and located in Newport Beach, California. As a registered investment adviser, HCM’s principal business is to provide investment advisory services to its clients.

HCM’s policy is to protect the confidentiality, integrity, and security of any non-public personal information of its current, prospective, and/or former clients (collectively, referred to as “clients”), and to prevent unauthorized access to, or the use or disclosure of such information. In its capacity as a registered investment adviser and in conducting its advisory business, HCM collects and receives certain non-public personal information concerning its clients. Any and all such non-public personal information is hereinafter referred to as Personal Identifiable Information (PII) For convenience, “you” or “your” refers to any and all client(s) described above and “we,” “our,” and “us” refers to HCM throughout this notice.

#### **Privacy Policy**

##### ➤ **Our Commitment to Your Privacy:**

No PII obtained by us is sold or made available to third parties, except for:

- Third parties may be used by us to assist in the management or maintenance of client accounts (e.g., a custodian, broker, or bank).
- Client information may be released to client's accountancy, legal and other third-party representatives with client’s prior consent;
- Client information may be released in accordance with applicable laws and regulations.

We will not share PII about our clients with affiliates and non-affiliated third parties without prior client consent, except for specific purposes described below. This notice explains our collection, use and safeguarding of client information.

➤ **How HCM Collects Information:**

In connection with providing, you with investment advisory services, we may obtain information about you from the following sources:

- Client agreements, trust agreements, and other personal information that you provide to us, whether in writing, in person, by telephone, electronically, or by any other means. This information may include your name, address, phone number, email address, social security number, employment information, income, investment experience, credit references, and tax returns;
- Transactions executed on your behalf. This information may include your account balances, positions, investment interests, and history;
- Consumer reporting agencies. This information may include account information, credit rating, and credit history; and
- Other public sources or databases.

➤ **Sharing Information with Affiliates and Non-affiliated Third Parties:**

We disclose PII to affiliates and non-affiliated third parties only in connection with us providing investment advisory services or in respect of conducting our investment advisory business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement, or regulatory authorities;
- To help prevent fraud;
- To the attorneys, accountants, and auditors of HCM;
- To comply with federal, state or local laws, rules, and other applicable legal requirements; and
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

HCM does not disclose your PII to other companies who may want to sell their products or services to you. For example, we do not sell client lists.

➤ **Opt-In / Opt-Out Provision:**

If, at any time in the future, it is necessary for us to disclose your PII in a way that is inconsistent with this policy, HCM will give you advance notice of the proposed disclosure so that you will have the opportunity to either opt-in or opt-out of such disclosure, as required by applicable law.

You are advised that HCM believes that sharing PII in the above circumstances is either mandated by law or necessary for us to conduct our business and to best service client accounts. Clients desiring not to opt-in to any third-party disclosures should contact HCM immediately. Refusing to opt-in may necessitate that we terminate our advisory agreement with you and arrange for you to de-link your account from HCM.

- **Former Clients:**  
We will disclose PII about former clients of our investment advisory business only as permitted and/or required by law or legal process, or with the former client's consent.
  
- **Our Security Practices and Information Accuracy:**  
We take great steps to safeguard client information. Access to personal and account information of clients is restricted to our employees and agents for business purposes only. We maintain physical, electronic, and procedural safeguards to guard your PII. Additionally, we have internal controls to keep client information as accurate and complete as possible. If you believe that any information about you is not accurate, please contact us.
  
- **Maintenance of Records:**  
PII about you will be maintained during the time you are a client, and for the mandatory time thereafter that such records are required to be maintained by federal and state securities laws.
  
- **Notice to Clients:**  
We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of PII other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.
  
- **Other Information:**  
Any examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. If you have any questions about this Privacy Policy, please contact Susan Nakamura, Chief Compliance Officer at 949-823-7751.