

FACTS

WHAT DOES EI CAPITAN ADVISORS, INC (the “Firm”) DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security Number and Income
- Account Balances and Account Transactions
- Risk Tolerance and Assets

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons the Firm chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does the Firm share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or at your request to other service providers you identify to us acting on your behalf.	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes— information about your transactions and experiences	No	Yes
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We don’t share
For non-affiliates to market to you	No	We don’t share

Questions?

Contact us at privacy@elcapitanadvisors.com

Who we are

Who is providing this notice? EL CAPITAN ADVISORS, INC

What we do

How does the Firm protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with state and federal law. These measures include computer safeguards and secured files and buildings.

How does the Firm collect my personal information? We collect your personal information, for example, when you:

- Enter into an Investment Advisory Agreement or Deposit Money
- Open an Account or Seek Advice about your Investments
- Seek Financial Advice or Provide Account Information

Why can't I limit all sharing? Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates Companies related by common ownership or control. They can be financial and/or nonfinancial companies.

- *El Capitan Advisors, Inc. does share with our affiliates.*

Non-affiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *El Capitan Advisors, Inc. does not share with non-affiliates so they can market to you.*

Joint marketing A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- *El Capitan Advisors, Inc. does not jointly market.*

Other Important information

Information for California and Nevada Customers

In response to a California law, we automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law. We will also limit the sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.

Nevada law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling 1-831-759-6300. To obtain further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone 1-702-486-3132; email BCPINFO@ag.state.nv.us.

If you wish to exercise any of these rights, please email privacy@elcapitanadvisors.com with the phrase “Data Subject Rights” in the subject line. You may also call us toll-free at (833)463-5227. We will review your requests and respond accordingly. The rights described herein are not absolute and we reserve all rights available to us at law in this regard. Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your data in response to a Data Subject Rights request. For important information related to our GDPR policy, please visit our website at www.elcapitanadvisors.com.