

# PRIVACY NOTICE

<b>Facts</b>	<b>What does FinTrust do with your personal information?</b>	
<b>Why?</b>	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.	
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information may include:</p> <ul style="list-style-type: none"> <li>• Information provided on applications or forms (for example, name, address, Social Security number, birth date, assets and income)</li> <li>• Employment information</li> <li>• Account information (for example, account balances, trading history, and transactions)</li> <li>• Suitability information (for example, risk tolerance, investment objective, time horizon)</li> <li>• Transfer instruction information (for example, wire transfer information)</li> <li>• We also collect personal information from others such as credit bureaus, affiliates, or other companies</li> </ul>	
<b>How?</b>	All financial companies need to share customers' and participants' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' or participants' personal information; the reasons FinTrust chooses to share; and whether you can limit this sharing.	
	<b>Reasons we can share your personal information.</b>	<b>Does FinTrust share?</b>
	<b>For our everyday business purposes-</b> Such as to process your transactions, maintain your capital account(s), respond to court orders and legal investigations, or report to credit bureaus	YES
	<b>For our marketing purposes-</b> To offer our products and services to you	YES
	<b>For joint marketing with other financial companies</b>	NO
	<b>For our affiliates' everyday business purposes-</b> Information about your transactions and experiences	YES
	<b>For our affiliates' everyday business purposes-</b> Information about your creditworthiness	We do not collect.
	<b>For our affiliates to market to you</b>	YES
	<b>For non-affiliates to market to you</b>	YES*
<b>To limit our sharing</b>	<p><i>*Should the FinTrust Representative who services your account leave us to join another firm, we may permit that representative to retain non-public personal information about you so that he or she can assist with the transfer of your account and continue to serve your needs at the new firm, if you so choose. The representative's continuing use of information about you will be subject to the privacy policy of his or her new firm.</i></p> <p><i>You have a right to "opt out" of our permitting your FinTrust Representative to retain non-public personal information about you if he or she leaves us to join another firm. If you do not want to permit your Representative to retain such information you may contact our Chief Compliance Officer at the address below. You may contact us at any time to limit sharing.</i></p> <p>FinTrust   124 Verdae Blvd. Suite 504   Greenville, SC 29607</p>	
<b>Questions?</b>	Contact our Chief Compliance Officer at 864-288-2849	

<b>Who we are</b>	
Who is providing this notice?	FinTrust Capital Advisors, LLC, FinTrust Brokerage Services, LLC, FinTrust Capital Benefit Group, LLC and GNI Capital, LLC (collectively known as “FinTrust”)
<b>What we do</b>	
How does FinTrust protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does FinTrust collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• Open an account</li> <li>• Make deposits or withdrawals from your account</li> <li>• Tell us about your investment objectives, risk tolerance</li> <li>• Provide account information</li> <li>• Seek advice about your investments</li> <li>• Give us your contact details</li> <li>• Make a wire transfer</li> <li>• We also collect personal information from others such as credit bureaus, affiliates, or other companies</li> </ul>
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes –information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you.</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to all parties – unless you tell us otherwise, in writing.
<b>Definitions</b>	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Our affiliates include FinTrust Capital Partners, LLC, FinTrust Capital Advisors, LLC, FinTrust Brokerage Services, LLC and FinTrust Capital Benefit Group, LLC and GNI Capital, LLC</i></li> </ul>
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>FinTrust may share personal information with non-affiliated third parties such as broker-dealers, banks and investment advisers for business purposes. FinTrust may also share personal information with parties who provide technical support for our hardware and software systems, our legal and accounting professionals.</i></li> <li>• <i>Should your FinTrust Representative leave, she or he may retain your information so that she or he may service your account at another firm unless you notify us in writing to limit this sharing.</i></li> </ul>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• <i>FinTrust does not jointly market.</i></li> </ul>
<b>Additional Information</b>	<b>Please Note:</b> When you are no longer a client, we continue to share your information as described in this notice. FinTrust reserves the right to change this Privacy Policy at any time. The examples contained within this Privacy Policy are illustrations and are not intended to be exclusive.  <b>Information for California, North Dakota, and Vermont Customers</b> In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.