



Tel: 617-422-7576
Fax: 617-239-4150
www.bdocap.com

BDO Capital Advisors, LLC
One International Place, 4th Floor
Boston, MA 02110

PRIVACY POLICY & COMPLAINT NOTIFICATION

The Securities and Exchange Commission requires broker-dealers to protect the financial privacy of consumers. BDO Capital Advisors, LLC (“BDO Capital”), a registered broker/dealer and member of FINRA/SIPC, considers the protection of your information to be a most important priority. Our privacy policy and practices are designed to support this objective. We want you to understand what information we collect and how we use it. “Non-Public Information” is information received by BDO Capital that identifies you, your business entity, and any personal or business assets. The following policies apply to consumers who are present or former clients of BDO Capital. We may collect Non-Public Information about our clients and parties who engage our firm to participate in certain securities transactions from the following sources:

- Information we receive from you on applications and other forms;
- Information we receive from you in order to provide certain investment banking advisory services;
- Information concerning your transactions with us, our affiliated persons, or others; and
- Information from a consumer-reporting agency or vendor providing anti-money laundering or Know Your Customer compliance services.

1. BDO Capital collects personal and business information in order to provide services. BDO Capital does not sell your information to anyone, under any circumstances.

2. Unless you have specifically authorized BDO Capital to do so, BDO Capital does not disclose your Non-Public Information to others except in two limited circumstances:

- BDO Capital discloses Non-Public Information to co-advisers, brokers and other agents that help us process your transactions, such as vendors providing administrative services, marketing services, data processing or computer software maintenance and development. These co-advisers, brokers, and vendors or other agents, are required to sign a non-disclosure agreement agreeing to maintain the confidentiality of Non-Public Information. These entities are also required to have policies and procedures in place to protect your confidential information.
- BDO Capital may also disclose Non-Public Information if BDO Capital believes in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators, or to comply with court orders.

For example, to help the government fight the funding of terrorism and money laundering activities, Federal Law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. So, when you begin a relationship with us, BDO Capital will ask for name, address, date of birth, date of incorporation and/or other information that will allow us to identify you and/or your business. BDO Capital may also ask to see your passport, driver's license, or other identifying documents.

3. BDO Capital collects information from you using due diligence lists, verbal requests, or other means determined by you or BDO Capital. The information we collect may include name, address, telephone and facsimile numbers, email addresses, and Social Security number or tax identification number, among other documents.

4. BDO Capital internally safeguards your Non-Public Information by restricting access to only those individuals associated with BDO Capital that provide products or services to you or to those who need access to your information in order to service your transactions. In addition, BDO Capital maintains physical, electronic, and procedural safeguards that meet applicable legal standards to protect your Non-Public Information. BDO Capital does not share information with any affiliated entities unless necessary to do so to service your transaction such as providing tax or consulting advice with your consent. Such affiliates have similar privacy policies and protections to safeguard Non-Public Information.

5. If at any time in the future, it is necessary for BDO Capital to disclose any of your information in a manner inconsistent with this privacy policy statement, BDO Capital will give you advance notice of the proposed change so that you will have an opportunity to "opt out" of such disclosure.

In the event you have a complaint, please direct written correspondence to the Compliance Department, at the address listed above.

If you have any questions regarding this policy, please contact us via phone at 617-239-4177 or via email at bsnape@bdocap.com.