

**SFI Capital Group, LLC Privacy Policy and Complaint Notification**

SFI Capital Group, LLC's ("SFI") relationship with you is based on trust, and protecting the privacy of your personal information is a high priority for us. "Non-Public Information" is information received by SFI 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 SFI.

1. SFI collects personal and business information in order to provide a high level of service. SFI does not sell your information to anyone, under any circumstances.
2. Unless you have specifically authorized SFI to do so, SFI does not disclose your non-public information to others except in three limited circumstances.
  - SFI may from time to time share client information with one of our affiliated companies. Due to the nature of our organization, SFI does share resources and office space with affiliated companies. While SFI has implemented procedures to limit your personal information to only those employees that need to know such information to provide you services, in the normal course of business, non-SFI employees may come into contact with your personal information. The affiliated companies of SFI include Sequoia Financial Group, LLC and Sequoia affiliates such as Sequoia Financial Insurance Agency, LLC and Sequoia Financial Advisors, LLC; Cohen & Company, Ltd. and Cohen & Company affiliates such as Cohen & Company Florida, Ltd. d/b/a Cohen Florida (formerly operating independently as Lanese & Associates, Mercurio & Bridgford, and KGLC), Cohen Fund Audit Services, Ltd., and SBB Capital Partners, LLC. However, it is the policy of SFI to receive your consent prior to one of our affiliated companies contacting you regarding the affiliated company's services.
  - SFI 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 nondisclosure agreement agreeing to maintain the confidentiality of non-public information. These entities are required to have policies and procedures in place to protect your confidential information.
  - SFI may also disclose non-public information if SFI 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, in order 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, SFI 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. SFI may also ask to see your passport, driver's license, or other identifying documents.

3. SFI collects information from you using due diligence lists, verbal requests, or other means determined by you or SFI. 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. SFI internally safeguards your non-public information by restricting access to only those individuals associated with SFI that provide products or services to you or to those who need access to your information to service your transactions. In addition, SFI maintains physical, electronic and procedural safeguards that meet applicable legal standards to protect your non-public information. SFI does not share information with any affiliated entities unless necessary to do so in order to service your transaction.
5. If at anytime in the future it is necessary for SFI to disclose any of your information in a manner inconsistent with this privacy policy statement, SFI will give you advance notice of the proposed change so that you will have any opportunity to "opt out" of such disclosure.

**For more information-**If you have questions about SFI's Privacy Policy please direct written correspondence to the address listed above.

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