



## PRIVACY POLICY

<b>FACT:</b>	What does D. Boral Capital LLC (d/b/a “D. Boral Capital”) do with your personal information?
<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, here at D. Boral Capital.
<b>WHAT?</b>	<p>The types of personal information we collect, and share, depends on the products or services you have with us. This information may include:</p> <ul style="list-style-type: none"> <li>▪ Name</li> <li>▪ Social Security Number</li> <li>▪ Employment Information</li> <li>▪ Address</li> <li>▪ Assets</li> <li>▪ Account Balances</li> <li>▪ Phone Numbers</li> <li>▪ Investment Experience</li> <li>▪ Other Financial Information</li> </ul>
<b>HOW?</b>	All financial companies need to share personal information to run their everyday business. In the section below, we list reasons financial companies can share their customers’ personal information, the reasons D. Boral Capital chooses to share information, and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION:	DOES D. BORAL CAPITAL SHARE?	CAN YOU LIMIT SHARING?
For our everyday business purposes – Such as to process your transactions, maintain our account(s), respond to court orders and investigations, and/or comply with regulatory requirements.	YES	NO
For our marketing purposes – To offer products and services to you.	YES	NO
For our affiliates’ everyday business purposes – Information about your transactions and experiences.	YES	NO
For our affiliates’ everyday business purposes – Information regarding your creditworthiness.	YES	YES
For our affiliates to market to you.	YES	YES
For joint marketing with other financial companies.	NO	We do NOT share your information
For non-affiliates to market to you.	NO	We do NOT share your information



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<b>TO LIMIT SHARING OF YOUR INFORMATION:</b>	<ul style="list-style-type: none"> <li>▪ You may call us at (212) 970-5150</li> <li>▪ You may email us at: <a href="mailto:privacy@dboralcapital.com">privacy@dboralcapital.com</a></li> <li>▪ You may send us a message on our website on our <b>Contact Us</b> page.</li> <li>▪ You may mail in the form attached on the following page.</li> </ul> <p><i>*Please note that if you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice, however, you may always contact us at any time to limit our sharing of your information.</i></p>
<b>TO LIMIT DIRECT MARKETING</b>	<ul style="list-style-type: none"> <li>▪ You may call us at (212) 970-5150</li> <li>▪ You may email us at: <a href="mailto:privacy@dboralcapital.com">privacy@dboralcapital.com</a></li> <li>▪ You may send us a message on our website on our <b>Contact Us</b> page.</li> <li>▪ You may mail in the form attached on the following page.</li> </ul> <p>Please note: Direct marketing is email, postal mail and telephone marketing. If you opt-out of telephone marketing, your opt out will be effective for five years. If you opt-out of postal mail marketing, your opt-out is effective for three years, subject to applicable law. Even if you limit direct marketing, we may still contact you to service your account or otherwise as allowed by law.</p>
<b>Questions?</b>	<p>If you have any further questions, please contact our office at (212) 970-5150</p>

## D. BORAL CAPITAL LLC IS PROVIDING THIS NOTICE

WHAT WE DO:	
How does D. Boral Capital protect my personal financial 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, secured files, and secure record-keeping facilities within our offices.
How does D. Boral Capital collect my personal information?	<p>We collect your personal information when you agree to provide it. For example, when you:</p> <ul style="list-style-type: none"> <li>▪ Open an Account</li> <li>▪ Update your Account</li> <li>▪ Seek Advice Regarding Investments</li> <li>▪ Correspond with us Via E-mail, Phone, etc.</li> </ul> <p>We may also collect your personal information from others, such as credit bureaus, affiliates, and/or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only the following:</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes – information about our creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See <i>Other Important Information</i> section for your rights under state law.</p>



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What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account/policy unless you tell us otherwise.
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## DEFINITIONS:

Affiliates	Companies related by common control or ownership. They can be financial or non-financial companies.
Non-Affiliates	Companies not related by common ownership or control. They can be financial or non-financial companies.  <i>*D. Boral Capital LLC does not share with non-affiliates so that they can market to you.</i>
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.  <i>*D. Boral Capital LLC does not jointly market.</i>

## OTHER IMPORTANT INFORMATION

<p><b>Do Not Call Policy:</b> This Privacy Notice constitutes D. Boral Capital’s Do Not Call Policy under the Telephone Consumer Protection Act for all consumers. D. Boral Capital maintains an internal Do Not Call preference list. Do Not Call requests will be honored within 30 days and will be effective for at least five years from the date of request. Telemarketing calls or prerecorded/artificial message calls may be made to residential or cellular phone numbers that appear on D. Boral Capital’s Do Not Call list with the appropriate consent. You may call us at 212-970-5150 or email us at <a href="mailto:privacy@dboralcapital.com">privacy@dboralcapital.com</a> to be placed on the D. Boral Capital Do Not Call list.</p>
<p><b>Nevada residents:</b> We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by following the directions in the To limit direct marketing section. For more information regarding our telemarketing practices, contact us at 212-970-5150 or <a href="mailto:privacy@dboralcapital.com">privacy@dboralcapital.com</a>. If you would like more information regarding this Nevada law, contact: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; 702-486-3132; <a href="mailto:AgInfo@ag.nv.gov">AgInfo@ag.nv.gov</a></p>
<p><b>Vermont residents:</b> We will not disclose information about your creditworthiness to our affiliates other than as permitted by Vermont law, unless you authorize us to make those disclosures.</p>
<p><b>California residents:</b> Under California law, we will not share information we collect about you with companies outside of D. Boral Capital, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law.</p>
<p><b>Business-to-business:</b> D. Boral Capital is committed to protecting personal information that may be collected online and offline in a business-to-business context, including the personal information of individuals in their capacities as representatives of business entities. For the categories of personal data that D. Boral Capital may collect and how we use it, please contact at <a href="mailto:privacy@dboralcapital.com">privacy@dboralcapital.com</a> for more details.</p>



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## MAIL-IN FORM

Mailing Address: Please send the completed *Mail-In Form* to the following address:

D. Boral Capital LLC  
Attn: Compliance Department  
590 Madison Avenue, 39<sup>th</sup> Floor,  
New York, NY 10022

If you have a joint account/policy, any and all boxes selected below will apply to everyone on your account unless the adjacent field is marked.

Apply all of my choices indicated on this form, to only my information maintained at D. Boral Capital.

Please mark any/all that you wish to limit:

I wish to limit the sharing of my information with regards to my creditworthiness, and do NOT want this information to be shared with your affiliates for their everyday business purposes.

I wish to limit the sharing of my information with your affiliates with regards to your affiliates using my personal information to market to me.

I wish to prohibit my financial professional from taking my non-public information to a new financial institution should he or she leave D. Boral Capital LLC.

Signature: \_\_\_\_\_

Name (First, Last): \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Account/Policy/Contract #: \_\_\_\_\_