Anchor Bay Capital, Inc.
PRIVACY POLICY

Your relationship with Anchor Bay Capital, Inc. is based on trust and confidence. To fulfill its responsibilities to you, Anchor Bay Capital, Inc. requires that you provide current and accurate financial and personal information. You deserve to expect that Anchor Bay Capital, Inc. will protect the information you have provided in a manner that is safe, secure and professional. Anchor Bay Capital, Inc. and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe Anchor Bay Capital, Inc. procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

Anchor Bay Capital, Inc. is committed to the protection and privacy of its customers' and consumers' personal and financial information. Anchor Bay Capital, Inc. will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of Anchor Bay Capital, Inc.'s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Opt-Out Provisions

It is not a policy of Anchor Bay Capital, Inc. to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.

Complaint Notification

Please direct complaints to: Anchor Bay Capital, Inc., Attn: Matt Large, 5780 Fleet Street, Suite 308, Carlsbad, CA 92008. Telephone: (760) 602-3470