

FACTS**WHAT DOES CAPES CAPITAL MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?**

Why? 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.

What? The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and account balances
- Transaction history and investment experience
- Address, email address and phone number

How? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Capes Capital Management chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Capes Capital Management share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	N/A
For our affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	N/A

To limit our sharing

- Call **(757) 622-8514** — our client service representatives can assist you.
- Or, visit our website at www.capescap.com

Please note:

If you are a *new* customer, we can begin sharing your information 7 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 can contact us at any time to limit our sharing.

Questions?

Call (757) 622-8514 or visit our website at www.capescap.com

Who we are

Who is providing this notice?

Capes Capital Management, Inc.

What we do

How does Capes Capital Management 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, firewalls and/or encryption as well as secured files and buildings.

How does Capes Capital Management collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit money
- pay your bills or apply for a loan
- perform a required initial or annual investor review

We also collect your personal information from other public sources **OR** our affiliate company.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

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 everyone on your account.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies. Our sole affiliate is Monroe Capital Partners, LLC.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and non-financial companies.

Joint marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- Capes Capital Management does not jointly market.

Other important information

Capes Capital Management, Inc. requires confidentiality agreements be executed and strictly enforced between all firms, affiliate or otherwise, with whom information is shared. Capes Capital Management does not sell any of customer information to other firms for any reason.