

Privacy Notice

PRIVATE CAPITAL MANAGEMENT, L.P. AND CARNES CAPITAL CORPORATION

Financial companies such as Private Capital Management, L.P. (“PCM”) and Carnes Capital Corporation (“Carnes”) are able to 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.

Commitment to Privacy

PCM and Carnes consider privacy to be fundamental to our relationship with our clients and we are committed to maintaining the confidentiality, integrity, and security of personal information we obtain from our clients. We limit the use of your personal information to what is necessary to fulfill legal and regulatory requirements, serve you as a client, facilitate the opening and maintenance of your accounts, and to process your transactions. After all, your relationship with us is built on trust and our goal is preserve that trust.

What Personal Information We Collect From You

We collect information such as your name, date of birth, address, email address, social security number, phone number, bank information, transaction history, and investment experience. This information is typically collected when we open an account for you. When you are no longer our customer, we will continue to share your information only as described in this notice.

Information Shared with Service Providers

We share the information that you provide to us with your approved service providers (brokers, consultants, custodians, and accountants) as well as our own service providers when they require this information to provide business services for us. When we share your personal information with businesses that provide services to us, these services are performed under written agreements that require the service providers to safeguard this information and use it solely for those purposes that are specified.

We also may share information with regulatory authorities and law enforcement officials who have jurisdiction over our business activities or if we are required to do so by applicable law.

Information Sharing with our Affiliates and Nonaffiliated Third Parties

Reasons for Sharing Your Personal Information	Do We Share?	Can You Legally Limit This Sharing?
For Our Marketing Purposes	No	Yes*
For Our Affiliates' Everyday Business Purposes	No	Yes*
For Nonaffiliates to Market to You	No	Yes*

Questions?

Please call our offices at 800.763.0337

What We Do

Why Can't I Limit All Sharing?

Federal law gives you the right to limit only:

- Information sharing for affiliates' everyday business purposes (including information about your creditworthiness);
- Affiliates from using your information to market to you; and
- Sharing for nonaffiliates to market to you.

PCM and Carnes do not disclose, and do not intend to disclose, nonpublic personal information to our affiliates or nonaffiliated third parties except as permitted by law.

***In short, our current policies already limit sharing of your personal information to the fullest extent provided by federal law.**

How Do We Protect Client 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 and secured files and buildings. Additionally, PCM and Carnes employees must sign confidentiality agreements as a condition of employment and must certify their compliance with privacy policies and procedures annually.

Applicable Definitions

Affiliates

Companies related by common ownership or control.

Nonaffiliates

Companies not related by common ownership or control.

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.