

PRIVACY POLICY

Lazari Capital Management, Inc. and/or Lyndhurst Securities, Inc. (“the Companies”) are committed to safeguarding the confidential information of our clients. Our policy, with respect to your personal information, is as follows:

Information We Collect and How We Gather Information

The information we collect is used in conjunction with the regular processing of business. We collect information about you from different sources. For example:

- Information you provide to us on applications and other forms (i.e. name, address, telephone number, date of birth, social security number, employment, assets, income, driver’s license, other identification numbers, etc.)
- Information provided by your transactions (i.e. when you trade in your account, wire funds, etc.)
- Information provided to us by our clearing firm, third-party service providers, mutual fund companies, insurance companies, former Broker/Dealers, and consumer reporting agencies about you (i.e. accounts, transactions in your accounts, account types, account balances, etc.)

Information We Share with Others

The Companies do not share your personal information for marketing or joint marketing purposes. Should this change, we will notify you prior to sharing any information. When available, we will offer you the ability to limit sharing of your personal information. The Companies share your information as necessary, in order to conduct business for your account. For example:

- With our employees, as needed, to open, maintain, and service your account(s)
- With unaffiliated third parties (i.e. clearing firms, product sponsors, banks) in order to carry out your instructions, and with unaffiliated third-party vendors in order to create and maintain records of your account(s) (i.e. when we provide information to third party vendors to create a statement, invoice, etc.)
- As required by law (e.g. response to a subpoena, governmental or regulatory request)

Limit Sharing

Federal law gives you the right to limit some forms of sharing. For example:

- Sharing for affiliates’ everyday business purposes
- Information about your creditworthiness
- Affiliates or non-affiliates from using your information to market to you (State laws and individual companies may give you additional rights to limit sharing; check your State for more information on your rights under State law)

Protecting the Confidentiality and Security of Your Information

The Companies have taken extensive measures to safeguard the privacy and integrity of the information that we gather, store, and archive during our normal course of business. We have physical, electronic, and procedural safeguards in place to protect the confidentiality of your personal information. Computer security measures have been instituted, where applicable, including passwords, backups, and encryption. All employees are informed and instructed on various security measures, including the non-discussion and/or sharing of client information, removing client information from desktops or unsecured working areas, and proper storage of client files and client information in locked file cabinets and other secured locations, respectively.

The Companies will retain records for a minimum of five years, or as otherwise required by applicable State or Federal law. With respect to disposal of nonpublic personal information, the Companies will take reasonable measures to protect against unauthorized access to, or use of, such information in connection with its disposal.

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This Privacy Notice for California Residents is provided for individuals covered by the California Consumer Privacy Act, 2018 (“CCPA”) who may have ever had a relationship with or interacted with Lazari Capital Management, Inc. and/or Lyndhurst Securities, Inc. (“the Companies”).

This Privacy Notice for California Residents is intended to be read in conjunction with the Companies’ Privacy Policy. This policy provides notice of all categories of personal information about Covered Individuals that the Companies may collect for the purposes of carrying out and supporting our business, as well as your rights to limit the sharing of such personal information.

What Information Do the Companies Collect?

The Companies collect the following personal information about Covered Individuals for the following purposes:

- Identifiers such as name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, and other similar types of identifying information. This information may be used to open, maintain, and service accounts, protect against fraud, and/or ensure compliance with legal and regulatory policies. It also may be used in our recruiting efforts and management of performance of existing employees or contractors.
- Commercial information, such as records of personal property, products or services purchased, obtained, or considered or other purchasing histories or tendencies may be used to open, maintain, and service accounts, protect against fraud, ensure compliance with legal and regulatory policies and/or recruiting.
- Internet and other electronic network activity information, such as browsing history, search history, cookies, interaction with a website, and/or other unique identifiers may be used to protect against fraud, ensure compliance with legal and regulatory policies, and/or recruiting.
- Biometric information, such as fingerprints, may be collected for licensing and registration and/or ensure compliance with legal and regulatory policies.
- Education information, such as degrees, and/or licenses, may be used to open, maintain, and service accounts, protect against fraud, ensure compliance with legal and regulatory policies, and/or recruiting.
- Professional or employment-related information such as work history, professional history, outside business activities, may be used for recruiting purposes and to protect against fraud, and/or ensure compliance with legal and regulatory policies.
- Geolocation data may be used to open, maintain, and service accounts, protect against fraud, ensure compliance with legal and regulatory policies, and/or recruiting.
- Sensory information such as voice recordings, images, and/or videos, may be used open, maintain, and service accounts, protect against fraud, ensure compliance with legal and regulatory policies, and/or recruiting.
- Inferences may be drawn from any of the information collected to open, maintain, and service accounts, protect against fraud, ensure compliance with legal and regulatory policies, and/or recruiting.

How Do the Companies Collect Personal Information?

The Companies collect personal information in conjunction with the regular processing of business. We collect the information from several sources, including:

- Information you provide to us on applications and other forms, such as your name, address, telephone number, date of birth, social security number, employment, assets, income, passport, driver’s license or other identification numbers.
- Information provided by your transactions, such as when you trade in your account or wire funds.
- Information provided in connection with recruitment activities.
- Information provided to us by our clearing firms, third-party service providers, mutual fund and insurance companies, our Registered Representatives and Investment Advisor Representatives, your former Broker/Dealer and/or Registered Investment Advisor, and consumer reporting agencies about you, your account, and transactions in your account.
- Information about your account, including account type and account balances.

- The Companies may also collect information from credit bureaus, from third parties that engage in business activities with the Companies, and through our website(s).

Do the Companies Share Personal Information?

The Companies may share your information with third parties for business purposes in order to open, maintain, and service accounts, protect against fraud, and/or ensure compliance with legal and regulatory policies. For example:

- With our employees, Investment Advisor Representatives and Registered Representatives as needed to open, maintain and service your account(s).
- With unaffiliated third parties, such as our clearing firms, product sponsors, and banks in order to carry out your instructions.
- With unaffiliated third-party vendors in order to create and maintain records of your account, such as when we provide information about your account to third-party vendors to create a statement.
- As required by law. For example, the firm may be required to respond to a subpoena, or a governmental or regulatory request.

The Companies do not sell personal information or use personal information for marketing or joint marketing purposes.

What Are Your Rights Under the CCPA?

The CCPA allows California residents to request what personal information has been collected and the purpose for which it was used. You may request that such information be deleted. There may be exceptions to the information that can be deleted, subject to applicable laws and regulations.

The Companies do not discriminate against anyone who chooses to exercise their rights under the CCPA.

How Do I Contact the Companies to Request Information and/or the Deletion of the Information?

To inquire as to what information may have been collected and/or to request the deletion of such information, please send an email to service@lazaricapital.com or info@lyndhurstsecurities.com or call 888.242.0318.