

R. SEELAUS & CO., LLC GROUP PRIVACY POLICY

The following describes how R. Seelaus & Co., LLC and its affiliates Seelaus Asset Management LLC, RSC Financial Products LLC, and Seelaus Financial, LLC, ("R. Seelaus & Co., LLC Group") handle your personal information, and what steps we take to protect your privacy. This policy applies to current and former customers. We do not use your personal information for marketing purposes.

Accessing Information

Access to customer information is authorized for official business purposes only. It is based on our need to know such information to assist your broker or advisor in providing products and services to you, or to conduct R. Seelaus & Co., LLC Group business. R. Seelaus & Co., LLC Group requires its employees and Pershing LLC (clearing agent) who have access to customer information to protect it and keep it confidential.

Collect Information to Conduct Business

R. Seelaus & Co., LLC Group collects information about you to help your broker or advisor serve your financial needs, provide customer service, offer new products or services, and fulfill legal and regulatory requirements. The type of information that your broker provides to R. Seelaus & Co., LLC Group varies according to the products or services you request through your broker or advisor, and includes but is not limited to:

- Information included on your application and related forms (such as name, address, Social Security number, net worth, and income).
- Information about your relationships with your broker or advisor (such as products or services purchased, account balances and payment history); and
- Information from visitors to R. Seelaus & Co., LLC Group's websites (such as that provided through online forms, site visitor-ship data and online information collecting devices known as "cookies.")

Security Standards

R. Seelaus & Co., LLC Group continues to assess new technology to evaluate its ability to provide additional protection of your personal information. We safeguard this information in accordance with federal standards and established security standards and procedures. Some of the measures we implement include use of physical, electronic, and procedural safeguards.

Sharing Information

In the course of conducting business, we may disclose some or all of the previously described information about you to our clearing agent, Pershing, LLC and other businesses including non-affiliated third parties, as allowed by law, for the purpose of:

- Providing customer service or account maintenance.
- In response to a subpoena, to prevent fraud, or to comply with an inquiry by a government agency or regulator, and
- To perform services for us or on our behalf to develop or maintain software.

If you wish to limit our sharing of information about you as described in this notice, you may do so by contacting us at the below phone number or address.

FACTS

WHAT DOES SEELAUS ASSET MANAGEMENT, LLC 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 | Age | Assets |
| ■ Name | Address | Risk Tolerance |
| ■ Income | Tax Bracket | Wire Instructions |

How?

All financial companies need to share customer personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer personal information; the reasons Seelaus Asset Management, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Seelaus Asset Mgmt. 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	Yes
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes— information about your transactions and experiences	No	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	No
For nonaffiliates to market to you	No	No

To limit our sharing

- Call 212-935-0755 —our menu will prompt you through your choice(s) **or**
- Visit us online: www.rseelaus.com

Please note:

If you are a *new* customer, we can begin sharing your information 1 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 212-935-0755 or go to www.rseelaus.com

Who we are

Who is providing this notice?

Seelaus Asset Management, LLC
-- Compliance Department

What we do

How does Seelaus Asset 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 and secured files and buildings.

In addition, the Firm limits information to only those persons who have a need to perform the services which are requested.

How does Seelaus Asset Management collect my personal information?

We collect your personal information, for example, when you

- Open an account or Have a life-changing event
- When we discuss matters or As requested by the client
- Periodically when we inquire if the account information is current

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?

Seelaus Asset Management will inquire of the joint account holder to verify that the limitation on sharing applies to them as well.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies.

- *Affiliate, U.S. SEC registered BD R. Seelaus & Co., LLC*
- *Affiliate, Insurance affiliate RSC Financial Products, LLC*
- *Affiliate, Leveraged Loan business Seelaus Finco LLC*
- *Affiliate, R. Seelaus UK LTD.*

Seelaus Asset Mgmt. does not share information with affiliates.

Nonaffiliates

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

- *Our clearing firm BNY Pershing*
Third parties whom we subscribe to their systems to fulfill the activities on your account (e.g. order entry systems)

Joint marketing

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

- *We do not share information with non-affiliated financial companies.*

Other important information

Thank you for the privilege of servicing your financial needs. Should you have any questions regarding this notice, please do not hesitate to call us at 212-935-0755 or via USPS mail at 26 Main Street, Suite 304, Chatham, NJ 07928.