

<b>FACTS</b>	<b>WHAT DOES CAPTRUST FINANCIAL ADVISORS DO WITH YOUR FINANCIAL INFORMATION?</b>																									
<b>Why?</b>	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.																									
<b>What?</b>	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ Account balances and assets</li> <li>▪ Transaction history</li> </ul>																									
<b>How?</b>	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 CapTrust Financial Advisors chooses to share; and whether you can limit this sharing.																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Reasons we can share your personal information</th> <th style="width: 25%;">Does CapTrust Financial Advisors share?</th> <th style="width: 25%;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td><b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td><b>For our marketing purposes –</b> to offer our products and services to you</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td><b>For joint marketing with other financial companies</b></td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For our affiliates' everyday business purposes –</b> information about your creditworthiness</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For our affiliates to market to you</b></td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For nonaffiliates to market to you</b></td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> </tbody> </table>			Reasons we can share your personal information	Does CapTrust Financial Advisors share?	Can you limit this sharing?	<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No	<b>For our marketing purposes –</b> to offer our products and services to you	Yes	No	<b>For joint marketing with other financial companies</b>	No	Not Applicable	<b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences	No	Not Applicable	<b>For our affiliates' everyday business purposes –</b> information about your creditworthiness	No	Not Applicable	<b>For our affiliates to market to you</b>	No	Not Applicable	<b>For nonaffiliates to market to you</b>	No	Not Applicable
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<b>Questions?</b>	Call (616) 392-5332 or go to <a href="http://www.ctfa.com">www.ctfa.com</a>																									

<b>Who we are</b>	
<b>Who is providing this notice?</b>	CapTrust Financial Advisors
<b>What we do</b>	
<b>How does CapTrust Financial Advisors protect my personal information?</b>	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 building.
<b>How does CapTrust Financial Advisors collect my personal information?</b>	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>▪ Open an account</li> <li>▪ Deposit money</li> <li>▪ Seek advice about your investments</li> <li>▪ Enter into an investment advisory contract</li> <li>▪ Tell us about your investment or retirement portfolio or earnings</li> </ul> <p>We also collect your personal information from other companies.</p>
<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>We have no affiliates.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership and control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>We do not share with nonaffiliates so that they can market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or service to you.</p> <ul style="list-style-type: none"> <li>▪ <i>We do not jointly market.</i></li> </ul>