NOTICE OF CAPITAL SYNERGY PARTNERS PRIVACY POLICY

Our commitment to Your Privacy: Capital Synergy Partners has a longstanding policy of protecting the confidentiality and security of information we collect about customers. We will not share nonpublic information about you ("Information") without your consent, except for specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

Why do we gather information? We collect information required to open an account, to transact business effectively and to safeguard your assets or your privacy. But we also continually strive to improve our services and provide you opportunities to use additional products and services you may find of interest. To do this, we gather information to help us assess your needs and preferences.

What information do we collect? The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and fax number, gender, education, occupation employer name and address. And to identify who you are, including birth date and Social Security number. Additionally, as required by law, to assess your experience in margin use and trading, we may also collect your approximate annual income, approximate net worth, approximate worth, and credit reports to assess your financial position.

When do we obtain information? You directly provide to us the majority of information we collect. You do this by completing the account application and related documentation, placing a trade, sending us an e-mail for questions or comment.

How do we use your personal information? Again, the trust of our clients is our most valued asset. Therefore, we use personal information only as appropriate to provide you quality service and security.

For example, Capital Synergy Partners may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your portfolio and trading activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

Capital Synergy Partners may also use demographic information provided by others on our clients so that we can develop products and services for our clients.

Should you close your account with us, Capital Synergy Partners will retain your information as needed to comply with regulatory requirements.

What information does Capital Synergy Partners share with affiliates, alliances and partners? Capital Synergy Partners may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. Capital Synergy Partners also forges partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, Capital Synergy Partners may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. We may also compare our client lists with those of our partners and affiliates to ensure that they are not sending messages to you if you've elected not to be so notified. In our strategic relationships, we will require that it be identified that an offer is being extended because of the relationship with us. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

An affiliate is a company that we own or control or with which there is common ownership with us and our parent company. We may share with our affiliate's information about our transactions and experiences with you such as name, e-mail address, mailing address, date of birth, employment status, and general account and demographic information. This information may be used for internal reporting, anticipating margin calls, and development strategies. We do not share information other than the types of transaction and experience information described above with our affiliates.

Do we share the information collected with any other third parties? The cornerstone of our Privacy Statement is the commitment to keep our clients' personal information confidential. Capital Synergy Partners does not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as noted earlier and as described below:

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose.

All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information. Examples of information shared are identifying information such as name, mailing address, e-mail address, telephone number, and information on account activity. If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Statement.

Capital Synergy Partners also reserves the right to disclose your personal information to third parties where permitted by law or where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

Does our Privacy Statement apply to the sites to which we link? No. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party and you should familiarize yourself with the privacy policy provided by that third party.

What about "cookies" and other tracking devices? Cookies are small text files sent from the Web server to your computer. Capital Synergy Partners may maintain a website that contains cookies. Cookies also may be placed by third parties when you access their sites through linking from a Web site. We do not have access to these cookies or any information that these cookies may contain. Please contact the third-party site for more information on these cookies. Although we encourage third parties to adhere to appropriate privacy policies and standards, we are not responsible for the actions or policies of such parties.

To administer and improve the Capital Synergy Partners Web site, we may use a third party to track and analyze usage and volume statistical information, including page requests, form requests, and click paths. All data collected for this purpose is owned and used by Capital Synergy Partners The third party may use cookies to track behavior and may set cookies on behalf of Capital Synergy Partners These cookies do not contain any personally identifiable information.

Will I be able to review, change or correct my information? Yes. Personal identifying information may be reviewed, changed or corrected at any time. You are responsible for maintaining the accuracy and completeness of your personal and other information. At least once every 36 months we will send you a letter asking you to confirm the information we have on file. If you would like to review your personal information or if you believe that any of your information is incorrect, or if you have any questions regarding your personal information, or if you have any other questions or concerns regarding this privacy policy, simply contact our office.

How will I know if there are any changes to this Privacy Statement?

Capital Synergy Partners will provide each client an annual Privacy Statement that will include all changes. Should you have any questions concerning our privacy policy, you may submit a written request for additional information to our Customer Service Department located at 2860 Michelle Drive, Suite 150, Irvine CA 92606.