



Valhalla Capital Group, L.L.C. Privacy Policy Notice

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The CFTC has approved regulations that impose various requirements on financial institutions' treatment of customer information. The regulations require that financial institutions develop privacy policies and disclose these policies to its customers.

Valhalla Capital Group, LLC (VCG) considers your privacy one of our utmost concerns. This Privacy Notice outlines our current policies and practices regarding how information about individual customers is collected and used. Should any portion of our current policies and practices change you will be sent a revised Privacy Notice in advance, thus providing you with sufficient notice to respond prior to the effective date of the change.

Personal Information

When you apply for or maintain a live account with VCG, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. Such information may include:

- Application information: information you provide to us on applications and other forms, such as your name, address, birth date, Social Security number, occupation, assets, and income;
- Transaction information: information about your transactions with us and with our affiliates as well as information about our communications with you. Examples include your account balances, trading activity, your inquiries, and our responses;
- Verification information: information necessary to verify your identity, such as a passport or driver's license. Examples also include background information about you we receive from public records or from other entities not affiliated with VCG. The USA PATRIOT Act requires us to collect information and take actions necessary to verify your identity.

About Cookies

Cookies are small files containing information that a Web site uses to track its visitors. VCG may set and access VCG cookies on your computer, enabling us to learn which advertisements and promotions bring users to our Web site. VCG or any of its divisions may use cookies in connection with VCG's products and services to track your activities on our Web sites. Such information that we collect and share would be anonymous and not personally identifiable.

Security Technology

VCG uses Secure Socket Layer (SSL) encryption technology in order to protect certain information that you submit. This type of technology protects you from having your information intercepted by anyone other than VCG while it is being transmitted to us. We work hard to ensure that our Web sites are secure and that they meet industry standards. We also use other safeguards such as firewalls, authentication systems (e.g., passwords and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data.

Sharing Information with Our Affiliates

We may share personal information described above with our affiliates for business purposes, such as, but not limited to, servicing customer accounts and informing customers about new products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law. Our affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company. The information we share with affiliates may include any of the information described above, such as your name, address, trading and account information. Our affiliates maintain the privacy of your information to the same extent VCG does in accordance with this Policy.

Sharing Information with Third Parties

VCG does not disclose your personal information to third parties, except as described in this Policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for



your account or facilitate your transactions with VCG, including those that provide professional, legal, or accounting advice to VCG. Non-affiliated companies that assist VCG in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that VCG dictates.

We may also disclose your personal information to third parties to fulfill your instructions or pursuant to your expressed consent.

We want you to know that VCG will not sell your personal information.

Regulatory Disclosure

Under limited circumstances, VCG may disclose your personal information to third parties as permitted by, or to comply with, applicable laws and regulations. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose, unless we describe how such information will be used at the time you disclose it to us or we obtain your permission.

Opt Out

You are not required to supply any of the personal information that we may request; however, failure to do so may result in our being unable to open or maintain your account or to provide services to you.

While we make every effort to ensure that all information we hold about you is accurate, complete, and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

If you do not wish to have your personal information disclosed to our affiliates or other third parties as described in this Policy, please contact us via e-mail at: info@ValhallaCapitalGroup.com

Please be advised, that if we receive such instruction we will not be able to service your account and must close any open and funded accounts you have.