

J. Hagan Capital, Inc.

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information.

This notice is provided to you on behalf of J. Hagan Capital, Inc. (JHC).

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets, and income;
- Information about your transactions with us, our affiliates, or others;
- Information about your visit to and store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the information electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use, and improve the user's experience.

Categories of Information We Disclose: We may disclose the same categories of non-public personal information that we collect, in accordance with this policy. JHC does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at JHC, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as custodians, broker-dealers, investment companies, insurance companies, other investment advisers, technology providers, and data processors;
- To third parties who perform services, marketing, client resource management, technology or other support services to help manage your account on our behalf;
- To your attorney, trustee, accountant, agent, or anyone else who represents you in a fiduciary capacity or whom you authorize us to communicate with;
- To our attorneys, accountants, auditors, compliance consultants, or other professional advisers; and
- To government entities or other third parties in response to subpoenas, court orders, regulatory inquiries, examinations, investigations, or other legal process, or as otherwise required or permitted by law.

How We Use Information: Information may be used by JHC and companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, custodians, broker-dealers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts and non-public information** from unauthorized access, fraud or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as an investment company, custodian, broker-dealer or other financial institution;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements, including reporting and recordkeeping obligations;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. If JHC uses eligibility information received from an affiliate for marketing solicitations, JHC will provide any notice and opt-out rights required by Regulation S-AM.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Prevention Program (ITPP) that is designed to detect, prevent and mitigate identity theft in connection with covered accounts. We have developed an ITPP to adequately identify relevant red flags, detect potential red flags, respond appropriately to prevent and mitigate identity theft, and update the program periodically to reflect changes in risks.

Our Security Policy: We restrict access to non-public personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural safeguards to safeguard confidential client information. We also maintain written policies and procedures designed to address the protection of customer information, including the detection, response to and recovery from unauthorized access to or use of customer information.

Succession Planning: In the event that the owner(s) of JHC retire, become incapacitated, perish unexpectedly, sell or transfer the business, or otherwise become unable to continue providing services, your information may be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan, merger, sale, assignment, transfer or change in control. Any assignment of an advisory agreement or change in control requiring client consent will be handled in accordance with applicable law and the terms of your signed agreement with JHC.

Your Right to Opt-Out: Federal privacy laws give you the right to restrict certain sharing of your personal financial information. These laws balance your right to privacy with JHC's need to provide information for normal business purposes. These rights do not apply to information shared for everyday business purposes, such as processing transactions, maintaining your account, responding to court orders or regulatory inquiries, reporting to credit bureaus, or sharing information with service providers who perform services for us as permitted by law. If JHC shares your personal financial information in a manner that gives you an opt-out right, you may opt out by contacting us at 502-690-5635 or by writing to us at 8311 Shelbyville Road, Louisville, Kentucky 40222. Your opt-out will remain in effect unless you revoke it in writing.

Call Monitoring and Recording: If you communicate with JHC by telephone, we may monitor or record the call for training, quality assurance, recordkeeping, compliance, or business purposes, as permitted by law.

SMS Texting: JHC sends text message updates and responses to financial customers to schedule appointments, respond to customer service requests, and provide other service-related communications. Mobile information will not be shared with third parties or affiliates for marketing or promotional purposes. We respect your privacy. We use information you provide to send and respond to your mobile messages. This includes sharing it with platform providers, phone companies, and other vendors who help us deliver messages. We won't share mobile information with third parties for marketing. Text messaging originator opt-in data and consent will not be shared with third parties, except as necessary to provide the text messaging service or as required by law. We may disclose information to satisfy legal, regulatory, or governmental requests, avoid liability, or protect our rights or property. This policy applies to your use of the Text Message Service and doesn't modify our general Privacy Policy, which may govern our relationship with you in other contexts.

You agree to receive customer care from JHC. Message frequency will vary. Message and data rates may apply. Carriers are not liable for delayed or undelivered messages. You can cancel SMS service at any time. Just reply STOP. Once you reply STOP to us, we will send a message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us. If you want to join again, just sign up as you did the first time, and we will start sending SMS messages to you again. If you are experiencing issues with the messaging program, you can reply with the word HELP for more assistance, or you can get help directly at 502-690-5635.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you. We treat non-public personal information about former customers in the same manner as non-public personal information about current customers, except as otherwise permitted or required by law.

Complaint Notification: Please direct complaints to: Jon Hicks at J. Hagan Capital, 8311 Shelbyville Road, Louisville, KY 40222; 502-690-5635.

Changes to This Privacy Policy: If we make any substantial changes in the way we collect, use, protect, or disseminate confidential information, we will notify you as required by law. If you have any questions concerning this Privacy Policy, please contact us at: J. Hagan Capital, 8311 Shelbyville Road, Louisville, KY 40222; 502-690-5635.