



PRIVACY POLICY

FACTS	WHAT DOES AMERICAN ALTERNATIVE CAPITAL, LLC (“AAC”) 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?	<p>American Alternative Capital, LLC collects and develops personal information about you. The term “Customer Information” means any type of personally identifiable information provided by you or gathered about you that is not generally publicly known. The essential purpose for collecting Customer Information is to provide and support the financial products or services you obtain from AAC. The categories of Customer Information collected by AAC depend upon the scope of the engagement with AAC and is generally described below.</p> <p>As a financial institution, AAC collects and develops Customer Information to provide financial products or services. Customer information AAC collects includes:</p> <ul style="list-style-type: none"> • Information we receive from you on applications or other forms, which may include Tax Identification or Social Security numbers, • Information we receive or obtain from credit, service bureaus or other third parties, • Information about your transactions with us or others, including your financial adviser.
HOW?	All financial companies need to share customers’ personal information to run their everyday business. In the following section, we list the reasons AAC can share your customers’ personal information; the reasons AAC chooses to share; and whether you can limit this sharing.
DOES AMERICAN ALTERNATIVE CAPITAL, LLC SHARE YOUR PERSONAL INFORMATION?	
Yes. To administer, manage and service customer transactions, it is necessary for us to provide access to Customer Information within AAC and to certain non-affiliated companies. AAC restricts access to Customer Information to Representatives and employees who need the information to perform their job responsibilities. AAC maintains agreements, as well as physical, electronic, and procedural security measures that comply with federal regulations to safeguard your Customer Information.	
REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	
<p>We may share Customer Information we gather with:</p> <ul style="list-style-type: none"> • Entities that provide services and products for use (including, but not limited to, fund administrators, investment companies, and fund sponsor companies). • Third-party administrators and vendors for the purpose of providing current and future information on your account (such as transaction history, tax information and performance reporting). <p>American Alternative Capital, LLC recognizes the right of each customer to select a Broker-Dealer representative to provide products and services.</p>	

INFORMATION WE COLLECT AND HOW WE USE THE INFORMATION

We may collect the following categories of personal information that may be covered by the CCPA and use it for the following purposes:

Types of Personal Information:

- Contact information and other personal identifiers, such as name, postal address, email address, phone number, unique personal identifier, account name, registration numbers, tax identification number, Social Security number, passport number, and other similar identifiers
- Commercial and financial information, such as records of personal property or financial accounts, products or services, other purchasing or consuming histories or tendencies, information on investments, investment objectives, risk tolerance, time horizon, assets, income, expenses, net worth, tax status, holdings, account balances, transaction history, investment experience
- Internet or electronic activity information and device and online identifiers, such as IP address, online identifier or device IDs, or other similar identifiers, information regarding interaction with a website or application, browsing history, calls and emails sent and received
- Professional or educational information, such as information about your employment and background
- Demographic and family information, such as date of birth, sex, marital status, such as whether a client is related to someone who is employed in the securities industry, information about related parties to an account, dependents, and beneficiaries, citizenship
- Audio and visual information, such as voicemail, or other telephone recordings (e.g., for our support lines)
- Professional, such as information about your employment or businesses
- Other information you make available to us, such as in an email or phone call
- Inferences drawn from personal information to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance

Our Uses of Personal Information

- Offering, providing, and supporting products and services, including processing accounts, communicating with you, marketing our products and services, and connecting you with other products and services
- Operating our business, including ensuring the security and sufficiency of our networks, systems, products, services, applications, facilities; improving the products and services we offer; managing risk; and securing accounts, property, and resources
- Complying with applicable regulatory and legal requirements; protecting our rights, property, and the safety of our employees or others; responding to lawful requests; and other legitimate business and commercial purposes (including in connection with a sale, merger or consolidation, or other transfer of assets).

FORMER CLIENTS

If you discontinue business with AAC, we will continue to operate in accordance with the principles stated in this Notice.

CAN YOU LIMIT THIS SHARING?

Yes. You may prevent disclosure of your Customer Information by instructing AAC not to provide your Customer Information in these instances by calling AAC at 248-428-8002, by email at support@americanaltcap.com, or by writing us at: 3909 Research Park Drive, Suite 250, Ann Arbor, Michigan 48108. You may prevent this disclosure now or at any later time. In addition, you may contact us to revoke, or withdraw, your instruction to not share your Customer Information.

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. See the website of your state of residence for more on your rights under state law.

WHERE TO FIND MORE INFORMATION	If you are an AAC client, you will receive our Privacy Notice, as required by federal law, which provides information about how we collect, share, and protect your personal information and provides information about opting out of such sharing. Please note that you may interact with a representative, other financial institutions, or other third parties (sometimes referred to as non-affiliates), and direct us to share information with such third parties as we provide products or services to you. AAC may not control the data practices of such third parties, and we recommend you review any applicable third-party privacy policies for information about their data practices.
KEEPING UP TO DATE WITH OUR PRIVACY NOTICE	
We may amend this policy at any time and will inform you of changes, as required by law. To receive the most up-to-date Privacy Notice, you may call us at 248-428-8002, write to us at: 3909 Research Park Drive, Suite 250, Ann Arbor, Michigan 48108, or visit www.americanaltcap.com .	
FINRA INVESTOR EDUCATION & PROTECTION	
In accordance with the Federal Industry Regulatory Authority (FINRA) Conduct Rule 2267, this is to inform you that you can obtain information regarding your broker including a brochure titled "BrokerCheck" by contacting FINRA BrokerCheck at 800-289-9999 or by visiting www.finra.org/brokercheck .	
SECURITIES INVESTOR PROTECTION CORPORATION	
In accordance with the Federal Industry Regulatory Authority (FINRA) Conduct Rule 2267, this is to inform you that you can obtain information regarding your broker including a brochure titled "BrokerCheck" by contacting FINRA BrokerCheck at 800-289-9999 or by visiting www.finra.org/brokercheck .	
AAC BUSINESS CONTINUITY SUMMARY DISCLOSURE	Significant business disruptions can vary in their scope, affecting only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, if needed, we will either transfer our physical operations to a local site and resume business within 24 hours or continue our operations utilizing remote access to our systems. In a disruption affecting our business district, city, or region, we will either transfer our physical operations to a local site and resume business within 3 days or continue our operations utilizing remote access to our systems. Our ability to recover and resume business in this time frame will be determined by the severity of the disruption. In either situation, we plan to continue in business and notify you through the AAC web site at www.americanalternativecap.com . If the significant business disruption is so severe that it prevents us from remaining in business, we will ensure our customers' prompt access to their account records. For full disclosure of our Business Continuity Program, please visit our website www.americanalternativecap.com .