

Privacy Policy for Celtic Capital Corporation (CCC)

What Does CCC 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.

1.1 Definitions

For purposes of this policy, the terms “Consumer,” “Client” and “Confidential Information” have the following definitions:

- A. “Consumer” is not necessarily a client but may be anyone who obtains financial products or services from Celtic Capital Corporation (CCC) used primarily for personal, family or household purposes. Examples of consumer relationships include: (1) a prospect with whom CCC is actively pursuing an investment relationship; or (2) a prospect who provides CCC with nonpublic information (such as net worth information or potential portfolio size) after attending a seminar or community event or listening to a radio talk show at which an employee of CCC is a featured speaker.
- B. “Client” means (1) an individual with a specific and continuous relationship with CCC who obtains or has obtained a financial product or service from CCC used primarily for personal, family or household purposes; or (2) that individual’s designated representative.
- C. “Confidential Information” is personally identifiable private information (information not available from public sources such as the phone book or a website) about the client or consumer, including information regarding name and address, age, social security number, assets, income, net-worth, account balance, account number, bank account information, beneficiary information and investment activity (such as purchase and redemption history).
- D. Affiliates mean companies related by common ownership or control. They can be financial and nonfinancial companies.
- E. Non-affiliates mean companies not related by common ownership or control. They can be financial and nonfinancial companies. These include broker/dealers, mutual fund companies, insurance companies and other financial institutions.

What? The types of personal information we collect and share depends on the product or service you have with us. This information can include: (1) Social Security Number and driver’s license number; (2) Account balances and income; and (3) Credit and payment history. When you are no longer our client, we continue to share your information as described in this notice.

1.2 Overview

CCC collects nonpublic information about clients and consumers. **CCC does not disclose or use non-public personal information about our clients, and/or former clients, other than to carry out the purpose for which the information is disclosed, or as permitted by law.** We will not share nonpublic personal information about clients or consumers with third parties not affiliated with CCC, except as noted below. Specifically, CCC may share personal information as necessary:

- A. To complete transactions or account changes as directed by the Client;
- B. To maintain or service a client’s account;

- C. If requested to do so by a client;
- D. With contracted service providers providing administrative functions for CCC; or
- E. If CCC is required or permitted by law or regulatory authorities with jurisdiction over the firm to do so.

How? For our everyday business purposes such as to process your transactions, maintain your account or accounts, respond to court orders and legal investigations, or to report to credit bureaus, CCC shares this information. CCC does not share information in the following areas: (1) for marketing purposes, (2) for joint marketing with other financial companies, (3) for our affiliates' everyday business purposes, (4) for our affiliates to market to you, and (5) for non-affiliates to market to you.

Why can't I limit all sharing? Federal law gives you the right to limit only (1) sharing for affiliates' everyday purposes-information about your creditworthiness, (2) affiliates from using your information to market to you, and (3) sharing for non-affiliates to market to you.

1.3 Privacy Notices

The following notice requirements apply to CCC's Clients.

- A. Initial Privacy Notices—We will deliver an initial privacy notice to a client before the client relationship is established—that is, before we begin to manage a client's account. We may deliver the privacy notice within a reasonable period of time after the client relationship is established if the client agrees to receive the notice at a later time.
- B. Annual Privacy Notices—We will deliver our privacy notice to clients on an annual basis, defined as every 12 months. We are not required to deliver annual privacy notices to former clients.
- C. Revised Privacy Notices—We will not disclose nonpublic information about a client to a non-affiliated third party other than as described in this policy unless: (1) We have provided the client with a revised notice describing the new policy; (2) We have provided the client with an "opt out" notice; and (3) We have provided the client a reasonable opportunity to opt out of the disclosure before CCC discloses the information to the non-affiliated third party.

CCC is not required to send privacy notices or provide opt-out elections to consumers unless we intend to share the consumer's nonpublic information with a non-affiliated third party.

How does CCC protect my personal information? 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. State laws and individual companies may give you additional rights to limit sharing.

1.4 Safeguarding of Client Records and Information

CCC will maintain administrative, technical and physical safeguards reasonably designed to ensure the security and confidentiality of client records and information, consistent with Securities and Exchange Regulation S-P, and that information will not be disclosed to an unaffiliated third party for any reason, without your prior written consent. We shall do the following to protect this information:

- A. Advise all employees and officers that everything handled in this office is private and confidential.

- B. Prohibit an employee from providing client information over the telephone or in response to an e-mail message unless the employee has identified the other person as the client, a fiduciary representative of the client, an authorized agent of the client (such as broker-dealers, custodians or administrative service providers).
- C. Maintain appropriate security measures for our computer and information systems, including the use of passwords and firewalls.
- D. Use locks and other appropriate physical security measures to safeguard client information stored in paper format.
- E. Engage a third party service provider only after we have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential personal information except as necessary to carry out its assigned responsibilities and only for that purpose.

1.5 Website Privacy

The importance of protecting your personal information online is critical in today's Internet environment. Therefore along with all of the security measures described above, CCC has posted a privacy policy statement on its web site. When you visit our web site, a cookie is never transmitted to your computer.

Special Notice: My disclosure statement on Form ADV (Part 2A and Part 2B) is available under "Firm Brochure and Supplement" on my website located at www.celticcapitalcorp.com and it is available in a printed version upon your request.

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