

FACTS

WHAT DO ABOR CAPITAL MANAGEMENT INC. AND ARBOR DIGITAL “(ARBOR)”, 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and employment information
- Account balances and transaction history
- Financial goals and investment experience

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Arbor chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Arbor share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders, and comply with regulatory requirements.	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We don’t share
For nonaffiliates to market to you	Yes	No

Questions?

Call 907.222.7581 or email info@acmi.com

Who we are

Who is providing this notice?

ARBOR CAPITAL MANAGEMENT AND ARBOR DIGITAL

What we do

How does Arbor 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 buildings.

How does Arbor collect my personal information?

We collect your personal information, for example, when you

- Open an account or transfer assets to us.
- Provide account statements or other documents to us.

Why can't I limit all sharing?

Federal law gives you the right to limit some but not all sharing related to:

- sharing for affiliates' everyday business purposes— information about your creditworthiness
- affiliates from using your information to market to you
- nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Arbor Digital is a division of Arbor Capital Management Inc. We do not have any other affiliates

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Our nonaffiliated business partners include qualified custodians holding client assets, client reporting and portfolio management vendors and other sub-processors

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- We have no such agreements

Other important information

You may have privacy protections under applicable state laws, including those for California residents. To the extent the state laws apply, we will comply with them when we share information about you, and in some cases may be limited by you.

California Residents:

The California Information Privacy Act provides additional protections to control whether we share some of your personal information. In accordance with California law, we will not share information we collect about California residents with outside companies, except as permitted by law, such as with the consent of the customer or to service a customer's accounts.