



PRIVACY POLICY

This privacy policy applies to www.castleberryfinancialservices.com owned and operated by Castleberry Financial Services Group LLC. This privacy policy describes how CFSG collects and uses the personal information you provide on our website: www.castleberryfinancialservices.com. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

CFSG has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program covers only information that is collected through this website, www.castleberryfinancialservices.com, and does not cover information that may be collected on the Patient Solutions page of the website.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.

Your privacy and the protection of your sensitive personal information are important to us. Because we collect and/or store certain types of information from and about you, it is necessary to explain our policy and the terms and conditions surrounding the capture and use of that information.

Employee Conduct

CFSG expresses its absolute commitment to integrity, and our corporate values and ethical standards and the associated business conduct we expect from all our employees. CFSG's Code of Conduct includes very specific guidelines concerning the safeguarding of confidential information, which includes customer information. In general, these guidelines limit employee access to confidential information, and limit the use and disclosure of such information to specifically authorized processes and transactions. If it is determined that employees have violated the Code of Conduct, corrective action may be taken, including immediate dismissal.

Verification of Practices

Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the confidentiality of information. These reviews may be conducted by our own internal staff, external accounting and auditing firms, and government regulators. Included in these self-assessments and examinations are reviews of the controls and safeguards related to consumer privacy.

Introduction

This policy discloses which information we collect and how we use it, as well as the choices you can make about the way your information is collected and used. We also explain how any personal and/or personally identifiable information that we may request will be used; these explanations can usually be found on the same pages where the information is requested. We also detail below our security policy, which describes how your personal information is protected both electronically and physically.

In general, and as described in detail below, we collect several types of information from you:

- ▣ Personal information required to verify your identity
- ▣ Personal and financial information necessary to assess your eligibility to invest through CFSG
- ▣ Optional personal information you may wish to share in the furtherance of your goals in using our site

Information about your visits to and use of this website or the websites of third party services to help us maintain the appropriate features, functionality and user experience

Information We Collect From You and About You

We collect personal and financial information from you while you use the site, and most of this collection occurs during registration. Some information is required and some is optional, some will remain private and some will be displayed to other users. We always let you know which is which. Additional information may be gathered during your subsequent use of the site, whenever you choose to provide it.

Certain personal information must be supplied during the investor registration processes, as indicated below, in order to (a) enable registered users to login to the site, (b) verify investors' identities, (c) investors' ability to invest by verifying that they are at least 18 years of age, and (d) guard against potential fraud.

This basic personal information includes:

- ▣ Your name (investor registration)
- ▣ Your email address (investor registration)
- ▣ Your date of birth (investor registration)
- ▣ Your home address and telephone number (investor registration)
- ▣ Your Social Security number (investor registration)

When you register as an investor, we will request some required and optional data in order to facilitate such activities as:

- ▣ Generating an investor profile on the site
- ▣ Enabling our financial services partners to verify identity, implement fund transfers and the receipt of investments
- ▣ Enabling our financial services partners to implement automatic payments and fund transfers
- ▣ Contacting you if there is a problem completing a transaction you requested or to discuss a problem with your account
- ▣ Maintaining regular communications with you as may be necessary to execute transactions you request.

In addition, we gather names and email addresses of people who contact us through our website with questions about our company or investment operations. We collect this information for the sole purpose of responding to such inquiries and do not store the contact information unless requested by these people, such as in the case of job applicants who submit resumes, etc.

Finally, CFSG collects information about your computer and your visits to our website, such as your IP address, geographical location, browser type, referral source, length of visit, and page views through the use of log files. We (and/or our service providers) use this aggregated information in the administration of our website to improve its usability and to evaluate the success of particular marketing/advertising campaigns, search engine optimization strategies and other marketing activities. We (and/or our service providers) use non-identifying and aggregated information to help optimize our website based on the needs of our users. Additionally, third parties may collect certain similar information about your computer and other pages you may visit when you visit CFSG's website, as discussed further below.

CFSG will retain your information for as long as your account is active or as needed to provide you services. CFSG will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Communications from Our Site

When you register on our site you will receive emails that confirm specific actions you requested. You will receive notifications confirming your registration, the successful verification of email addresses and bank accounts, if required. These are transactional notifications that you cannot opt out of receiving, as they are in place to protect the security of your account and your personal information. We may also send you responses to emails you send us, if appropriate or applicable.

Links to Third Party Websites

CFSG is not responsible for the information practices employed by sites linked to or from our website. In most cases, links to non-CFSG websites are provided solely as an access point to obtain information on products and topics that may be useful to the users of CFSG's website. Third party websites may have different privacy policies and/or security standards governing their sites.

How and When Your Information Is Shared With Other Parties

Information is shared with other parties in the following ways:

- Required and optional information about investors is displayed on public profiles that members can update at any time. Certain information is optional, and you can choose not to supply it, or have it removed at any time. CFSG may, but is not obligated to, monitor any entered optional information to assist in the protection of your identity.
- Information is shared directly between users and other potential users. Information shared directly by users might contain personal information.
- CFSG may, with your consent, share required and optional information about you.

Social Media Widgets

Our website includes social media features, such as the Facebook Like button. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

Compliance with State and Federal Laws

This privacy policy may not constitute your entire set of privacy rights, as these may also vary from state to state. To be certain of your privacy rights, you may wish to contact the appropriate agency in your state that is charged with overseeing privacy rights of consumers. Certain regulations issued by state and/or federal government agencies may require us to maintain and report demographic information on the collective activities of our membership. We may also be required to maintain your personal information for at least seven years in order to be in compliance with applicable federal and state laws regarding recordkeeping, reporting, and audits.

Links to Other Sites

We may offer links to partners' sites. We make the decision to provide links to these sites based on the quality of information provided at the time the links are enabled or to facilitate our customers' more effective use of our platform, and we make every effort to monitor the continuing quality of content provided on these sites. However, these external sites are not subject to this privacy policy and may have different privacy policies or approaches to the handling of information. Further, CFSG has no control over the content of these sites. Please consult the privacy policies on these sites before you provide them with any of your personal information.

CFSG Security Policy

Industry-leading standards and controls

CFSG takes strong steps to safeguard your personal information. We maintain a comprehensive security program based on industry standards and best practices.

We take a defense-in-depth approach to implementing rigorous physical, administrative, and technical safeguards to ensure your information is safe from unauthorized access or misuse. The safeguards include preventive, detective, and corrective controls. Physical safeguards like security guards, access badges, and a video monitoring system protect CFSG computing infrastructure from unauthorized access. Administrative safeguards like a security training program, employment background checks, and acknowledgement of our Acceptable Use Policy ensure that your information is only accessed by trained and trusted staff based on business needs to provide services to you. Technical safeguards like perimeter security, industry standard encryption, two-factor authentication, and continuous monitoring ensure that your information is adequately protected with layered and complementary controls. The security safeguards are reviewed and adjusted periodically based on ongoing risk assessment. However, despite our substantial investment in protecting your personal information, ultimately no institution can guarantee its absolute security.

If you have any questions about security on our website, you can contact us at castleberryfinancialservices.com

Encryption & website Certificates

Industry standard encryption protects the information you share with us from the moment it leaves your computer until it reaches our systems. Look for the secure "locked padlock" on your browser to confirm the identity of the CFSG website and that your connection is secure. Consult your Web browser documentation for more information.

Session time-outs

CFSG employ session time-outs to protect your account. You will be logged out of the site automatically after a period of inactivity. This reduces the risk of others being able to access your account if you leave your computer unattended.

Passwords

You should never share your password with anyone. Your password is not known to any CFSG employee or third party, and we will never ask for your password by phone or email. If you ever receive a communication claiming to be from CFSG that asks for your password, you should immediately report it by contacting us at castleberryfinancialservices.com.

What you can do

In addition to our own substantial efforts, you can take several precautions to protect the security of your computer and personal information. For instance, you can start by using a well-chosen password. You should avoid using any information that others can easily learn about you, such as a family member's name or birthday, and you can also use special characters in place of letters. We also recommend that you change your password frequently. You can also install and regularly update antivirus and firewall software to protect your computer from external attacks by malicious users. When you are finished with a session on our site, be sure that you log out and close the browser window.

To protect your account, we send automatic notifications confirming certain actions taken on your account, such as changes to a password or external linked account. We do this for your own protection so that you can be sure no one else is making changes to your account without your knowledge. However, the security offered through these notifications can be undermined if other people have access to your email account. Therefore, you might consider restricting access to the email account you registered with on this site and/or changing your password on that email account frequently.

If you use a computer that is accessed by other people, such as in a public library or Internet cafe, we recommend that you take special precautions to protect the security of your account and personal data. When you are finished using our site, you should log out completely, then close the browser window and clear the browser's cache files.

You should also be aware of fraudulent attempts to gain access to your account information known as "phishing." Phishing is a tactic used by scammers in which unsuspecting people are brought to a website by a genuine-looking email purporting to be from a legitimate company. The phony or "spoof" email takes the person to a website that looks legitimate but in fact is not. Either in the email itself or on this fake site, scammers will ask for login information to gain access to people's accounts and withdraw their money. CFSG will never ask you for your login information in the context of any email. In general, you can protect yourself against phishing by never providing personal or login information via an email instead, go the website directly. You might also make it a habit to check the URL of a website to be sure that it begins with the correct domain. In the case of CFSG, you should always ensure the URL begins with <http://www.castleberryfinancialservices.com>

CFSG May Make Changes to This Policy

As technologies, laws, and user needs change, our site and its features will also change. This policy may be updated from time to time as such needs dictate, and we will always communicate these changes to you by posting them on this website and/or by notifying you via email prior to the change becoming effective in the event of any substantive or material changes.

You may contact us at:

Castleberry Financial Services Group, LLC.

12794 W. Forest Hill Blvd

Suite 10

Wellington, Florida 33414

(877) 640-9393

Via email at: castleberryfinancialservices.com

If CFSG is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Exhibit A

Privacy Notice

Facts	What does CFSG 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: <ul style="list-style-type: none">▣ Social Security number and income▣ Account balances
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 CFSG chooses not to share; and whether you can limit this sharing.

When you are no longer our client, we will not share your information as described in this notice.

Reasons we will not share your personal information	Does Castleberry 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 legal investigations, or report to credit bureaus	NO	YES
For our marketing purposes - to offer our products and services to you	NO	YES
For joint marketing with other financial companies	NO	YES
For our affiliates' everyday business purposes - information about your transactions and experiences	NO	YES
For our affiliates' everyday business purposes - information about your creditworthiness	NO	YES
For our affiliates to market to you	NO	YES
For non affiliates to market to you	NO	YES

What we do	
How does CFSG 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 CFSG collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▫ Open an account or pay us by check ▫ Provide account information or give us your contact information <p>We also collect your personal information from others, such as affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ▫ Sharing for affiliates' everyday business purposes-information about your creditworthiness ▫ Affiliates from using your information to market to you ▫ Sharing for non-affiliates companies to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account - unless you tell us otherwise.

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▫ Our affiliates include Castleberry Holdings Inc
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▫ Nonaffiliates we share with can include other financial services companies, lenders, insurance companies, retailers, membership clubs, or other consumer service providers.
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▫ Our joint marketing partners include other financial services companies, lenders, insurance companies or other consumer service providers.