



PRIVACY NOTICE

Financial companies choose how they share client information. Federal law gives consumers and clients the right to limit some but not all sharing, and requires us to tell you how we collect, share, and protect your personal information. Please read this Privacy Notice carefully to understand what we do.

Information We Collect

For purposes of this Privacy Notice, **“non-public personal information”** or **“NPI”** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with a particular consumer, current client, former client, or household. The categories of NPI Future Capital collects vary depending on the services we provide and may include your name, email address, postal address, phone number, asset information, income, information regarding your financial needs and goals, account balances and transactions, and family and household information. We collect NPI about you in several ways, such as through account creation, account customization, questionnaires, transactions, your employers, your recordkeeper, communications between you and us, information provided by your authorized representatives, and information you provide regarding or access you give us to third-party accounts.

Information Use and Disclosure

Future Capital has adopted procedures to implement our privacy policies which are designed to safeguard NPI and comply with applicable law and regulation. Future Capital will not share or disclose NPI to any nonaffiliated third parties except as required by law, authorized by you or your representative, or in accordance with this Privacy Notice and our [Privacy Policy](#). However, we will disclose certain NPI in order to provide our services. For example, we may disclose certain NPI to (1) your authorized 401(k) providers, authorized brokers, and authorized investment advisors, (2) our business partners with whom we jointly offer products or services, (3) third party service providers who help us provide our services, (4) third parties who refer you to our Services, (5) third parties assessing our compliance or conducting financial, technical, and legal audits of our operation, (6) third party service providers who assist us in marketing our products and services to you, (7) attorneys, accountants, and auditors, (8) as required by law or regulation, and (9) to detect, prevent, and address any illegal activity on or through our services. Further, our employees are prohibited, both during and after termination of employment, from disclosing NPI to any person or entity outside of Future Capital (including family members) except under the permitted circumstances described above. Third-party service providers are subject to confidentiality obligations and use restrictions.

Information Safeguarding and Disposal

To protect client information, Future Capital maintains an Information Security Program outlining the administrative, technical, and physical safeguards used for our physical office and storage space, electronic and computing devices, equipment, systems, software, and network resources. Our information systems are access controlled, meaning only authorized individuals may gain access to that system. Further, physical locations that may contain NPI (such as our offices) are access restricted. We review and update our Information Security Program at least annually but may do so more frequently when necessary to address a new risk or any change to our services.

Future Capital employees are permitted to disclose NPI only to other employees who need to have access to the information to provide our services to the client. Employees with access to NPI are bound by obligations of confidentiality both during and after their employment and required to keep such information in a secure physical compartment or behind a password-secured and firewall-protected electronic or computer file. Employee conversations involving NPI, if appropriate at all, are required to be conducted in a private, secure environment.

You may request that we delete your NPI; however, such a request may disqualify you from using our services. In some instances, we may be required (by law or otherwise) to retain your NPI and will comply with your deletion request only after we have fulfilled such requirements. Any deleted NPI is removed from our active database but may remain in our archives for regulatory compliance purposes.

Privacy Notices

When a new client relationship is established, Future Capital provides each of its natural person clients with an Initial Privacy Notice containing our current privacy practices. Future Capital provides each client with an updated notice of our privacy practices at least annually, provided that we are not required to deliver an annual privacy notice if (1) we only share NPI with nonaffiliated third parties in a manner that does not require an opt-out right be provided (e.g., disclosing NPI to a service provider or for fraud detection purposes) and (2) we did not change our policies and practices with respect to disclosing NPI since we last provided a privacy notice to clients. If we adopt a material change to our privacy practices, we will provide each client with a revised notice reflecting the new practices.

Opt-Out

Generally, clients must close their account in order to opt out of further providing us with NPI because certain NPI is necessary for Future Capital to provide its services. If Future Capital ever plans to share NPI with a nonaffiliated company under circumstances not covered by an exception under Regulation S-P, we will provide each affected client an opportunity to opt out of such information sharing.

Third-Party Websites

Future Capital's website may contain links to external websites. Any information you send to companies that are linked to our website is out of our control and not covered by our privacy practices. Please note that we are not responsible for any privacy policies provided by organizations whose links appear on our website.

Contact Us

If you have any questions about this Privacy Notice or the practices described herein, you may contact us at support@futurecapital.com. Please use the subject line "Privacy Notice." Our current Form ADV Part 2A (Firm Brochure) and Part 3 (Client Relationship Summary) and our full Privacy Policy are each available at <https://futurecapital.com/legal>. You may request a free copy of these documents be mailed to you by calling the Client Success Team at 888-871-5711 or emailing support@futurecapital.com.