



PRIVACY STATEMENT

Timbrel Capital, LLC ("Timbrel") is a broker-dealer registered with the Securities and Exchange Commission ("SEC") and is a member of the Financial Industry Regulatory Authority ("FINRA"). Timbrel is a Managing Broker-Dealer for certain investments offered through retail broker-dealers. It does not offer services directly to retail investors.

When does Timbrel collect personal information?

In its capacity as a Managing Broker-Dealer, Timbrel does not directly collect non-public, personally identifiable information (PII) about consumers.

However, in facilitating the offer and sale of investment products through broker-dealers to consumers as well as working with the product sponsors, Timbrel will come into possession of PII disclosed by investors and prospective investors on product subscription documents and applications.

What information does Timbrel access?

Product applications generally request prospective investors to disclose personal information including social security numbers, dates of birth, net worth, income, employment, other investments and information about joint applicants.

How does Timbrel protect personal information?

Timbrel will maintain investor and prospective investor PII in a secured environment; protect computers and backed up data through physical and electronic safeguards; and limit access to personal, non-public information to responsible employees who require access to that information in order to act on the investor's or sponsor's behalf.

Timbrel maintains physical, electronic and procedural safeguards to help ensure that personal information is safe and accessed only according to these policies. Safeguarding privacy is a high priority. These safeguards are intended to:

- ensure the security and confidentiality of investor and sponsor records and information;
- protect against any anticipated threats or hazards to the security or integrity of such records; and
- protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any investor or sponsor.

Does Timbrel share personal information?

Timbrel may disclose non-public, personal information to qualified entities that perform administrative services on its behalf, and as required or permitted by law for legal or regulatory purposes.

The entities with which Timbrel may share information include:

- The financial advisor and the broker-dealer or investment adviser that recommended the investment to the investor;
- Affiliated entities which provide services directly to investors or which provide services to us;
- Third parties that perform services on our behalf;
- An investor's attorney, trustee or anyone who represents him or her in a fiduciary capacity;
- Our attorneys, accountants or auditors; and
- Government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

Timbrel will destroy any confidential information in a secure manner (including shredding, burning, processing through a secure recycling facility, etc.) to ensure the continued confidentiality of that information after record retention periods expire.

Timbrel provides training to its employees and representatives, who are obligated to take reasonable steps to protect, safeguard and properly dispose of personal, non-public information.

Timbrel does not otherwise share personal, non-public information with affiliates and non-affiliated third parties for marketing purposes.

If you should have any questions regarding any aspect of this Privacy Statement, please call our Compliance Department at 678.954.4100.