

FACTS

WHAT DOES IDB CAPITAL CORPORATION (“IDB CAPITAL”) 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?	<div>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"><li>Social Security number and income</li><li>Account balances and account transactions</li><li>Employment information and investment experience</li></ul></div> <div>When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</div>
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 IDB Capital chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does IDB Capital 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	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 do not share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We do not share
To limit our sharing	<div>■ For IDB Capital products and services, call toll-free at (888) 695-3661</div> <div>Please note: If you are a <i>new</i> customer, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</div> <div>However, you can contact us at any time to limit our sharing.</div>	

Questions?

For questions, call toll-free at (888) 695-3661.

Who we are	
Who is providing this notice?	This notice is provided by IDB Capital Corporation.

What we do	
How does IDB Capital protect my personal information?	To protect your personal information from unauthorized access and use, we restrict access to your nonpublic personal information to employees and service providers to administer products or services to you. We also use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does IDB Capital collect my personal information?	<div>We collect your personal information, for example, when you<ul style="list-style-type: none"><li>• Open an account or seek advice about your investments</li><li>• Show your government-issued ID or buy securities from us</li><li>• Give us your income information</li></ul></div> <div>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</div>
Why can't I limit all sharing?	<div>Federal law gives you the right to limit some, but not all, sharing relating to<ul style="list-style-type: none"><li>• Affiliates' everyday business purposes – information about your creditworthiness</li><li>• Affiliates using your information to market to you</li></ul></div> <div>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</div>
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	<div>Companies related by common ownership or control. They can be financial and nonfinancial companies.</div> <ul style="list-style-type: none"><li>• <i>Our affiliates include financial companies with common and uncommon corporate identity names, such as Oakhurst Capital Advisors, LLC, Lido Advisors, LLC, IDB Lido Wealth, LLC, Israel Discount Bank of New York and Israel Discount Bank Limited and its subsidiaries.</i></li></ul>
Nonaffiliates	<div>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</div> <ul style="list-style-type: none"><li>• <i>IDB Capital does not share with nonaffiliates so they can market to you.</i></li></ul>
Joint marketing	<div>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</div> <ul style="list-style-type: none"><li>• <i>Nonaffiliates we share with may include insurance companies, financial institutions, and other entities through which we offer products.</i></li></ul>

Other important information	
<b>For California Customers:</b> In accordance with California law, IDB Capital will not share information we collect about California residents with nonaffiliates and business partners, unless permitted by law. For example, we may share information with your consent, or to service your accounts. We will limit sharing among our companies to the extent required by California law.	
<b>For Nevada Customers:</b> Nevada law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling (888) 695-3661 . To obtain further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone 1-702-486-3132; email <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a> .	